UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET, SW
ATLANTA, GEORGIA 30303-8909

MAR 25 1998

4WD-RPB

Mr. Jerry Banks
Hazardous Waste Division
Mississippi Department of
Environmental Quality
P.O. Box 10385
Jackson, Mississippi 39289-0385

SUBJECT: Transmittal of Preliminary Draft HSWA Permit
Textron Automotive, Inc.
Grenada, Mississippi Facility
EPA ID No. MSD 007 037 278

Dear Mr. Banks:

Enclosed is a copy of the preliminary Draft Environmental Protection Agency (EPA) Hazardous and Solid Waste Amendment (HSWA) Permit for the referenced Textron Automotive facility. The Draft HSWA Permit is provided as discussed between Mr. Tim Aultman, of your staff, and Ms. Lael Butler, of my staff. Contained in the Draft HSWA Permit are the requirements to perform a RCRA Facility Investigation at 6 solid waste management units (SWMUs) and 2 areas of concern (AOCs); no further action at 17 SWMUs and 0 AOCS; and, requirements to conduct Confirmatory Sampling at 2 SWMUs and 1AOC.

As discussed with Mr. Aultman, the Draft HSWA Permit will be forwarded toTextron Automotive along with the Draft Mississippi Department of Environmental Quality (MDEQ) Post-Closure Permit for a review prior to public notice. Comments provided by the facility will be addressed prior to public notice, where possible. Should there be any questions or concerns, please contact Ms. Butler, at (404) 562-8453.

Sincerely,

Lael H. Butler

Kent Williams, Chief for
South Programs Section
RCRA Programs Branch

Enclosure

HSWA PORTION OF THE RCRA PERMIT

OWNER/OPERATOR: Textron Automotive Company
635 Highway 332
Grenada, Mississippi 38901

EPA I.D. No. MSD 007 037 278

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976, 42 USC Section 6901 et seq., and the Hazardous and Solid Waste Amendments (HSWA) of 1984, P.L. 98-616, and regulations promulgated thereunder by the U.S. Environmental Protection Agency (EPA) (codified and to be codified in Title 40 of the Code of Federal Regulations), a permit is issued to Textron Automotive Company (hereafter called the Permittee), who owns and operates a hazardous waste facility located in Grenada, Mississippi, at latitude _ °_'_" and longitude _ °_'_".

This Permit, in conjunction with the Hazardous Waste Management Permit issued by the State of Mississippi, constitutes the full RCRA Permit for this facility. The Permittee, pursuant to this permit, shall be required to investigate any releases of hazardous waste or hazardous constituents at the facility regardless of the time at which waste was placed in a unit and to take appropriate corrective action for any such releases. The permit also requires the Permittee to comply with all land disposal restrictions and air emission standards applicable to this facility and to certify annually that on-site generation of hazardous waste is minimized to the extent practicable.

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in any attachments) and applicable regulations contained in 40 CFR Parts 260 through 264, 266, 268, 270, and 124 as specified in the permit and statutory requirements of RCRA, as amended by HSWA. Nothing in this permit shall preclude the Regional Administrator from reviewing and modifying the permit at any time during its term in accordance with 40 CFR §270.41.

This permit is based on the premise that information and reports submitted by the Permittee prior to issuance of this permit are accurate. Any inaccuracies found in this information or information submitted as required by this permit may be grounds for termination or modification of this permit in accordance with 40 CFR §270.41, §270.42, and §270.43 and potential enforcement action. The Permittee must inform EPA of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

The authority to perform all actions necessary to issue, modify, enforce, or revoke this permit has been delegated by the Regional Administrator to the Waste Management Division Director.

This permit is effective _____, and shall remain in effect for ___ years until _____, unless revoked and reissued, or terminated under 40 CFR §270.41 and §270.43 or continued in accordance with 40 CFR §270.51(a). All obligations for performance of HSWA provisions required under this permit are in effect until deemed complete by the Regional Administrator.

If any conditions of this permit are appealed in accordance with 40 CFR §124.19, the effective date of the conditions determined to be stayed in accordance with 40 CFR §124.16 shall be determined by final agency action as specified under 40 CFR §124.19.

_____
Issued Date

_____
Richard D. Green
Acting Director
Waste Management Division

APPENDIX A

SOLID WASTE MANAGEMENT UNIT SUMMARY

A.1. List of solid waste management units (SWMUs) and areas of concern (AOCs) requiring a RCRA Facility Investigation (RFI):

SWMU/AOC No/Letter	SWMU/AOC Name	Unit Comment	Dates of Operation	Potentially Affected Media[1]
SWMU 2	Equalization Lagoon	Surface Impoundment	1961-1994	A, SS, SW, GW, S
SWMU 3	On-Site Landfill	Landfill	1961-1967	A, SS, SW, GW, S
SWMU 4	Sludge Lagoon	Surface Impoundment	1977-Present	A, SS, SW, GW, S
SWMU 7	Outfall Ditch	Ditch	1961-Present	A, SS, SW, GW, S
SWMU 12	Wet Well	Inground Tank	1977-Present	A, SS, SW, GW, S
SWMU 14	Destruct Pit	Chromium Reduction Unit/ Holding Sump	1961-Present	A, SS, SW, GW, S
AOC A	Forner TCE Storage Area	Contamination Area	≈1973-Present	A, SS, SW, GW, S
AOC B	Former Toluene UST Area	Contamination Area	Late 1960s-Present	A, SS, SW, GW, S

[1]Potentially Affected Media:
A - Air
SS- Subsurface Gas
SW - Surface Water
GW - Ground Water
S - Soil

[Notes 990104]

(During the RI for the On-Site LF) The units marked above were identified as potential sources of impact. They were not investigated via soil or gw sampling.

* RI = See Remedial Inv. Report Draft : 940127

See also "Final Soil Interim Remedial Action Report", 931011.

A.2. List of solid waste management units (SWMUs) and areas of concern (AOCs) requiring no further action at this time:				
SWMU/AOC No/Letter	SWMU/AOC Name	Unit Comment and Basis for NFA	Dates of Operation	Potentially Affected Media [1]
SWMU 1	Less Than 90-day Drum Storage Area	Container Storage Area	Mid 1980s-Present	NA
SWMU 5	Former Solid Waste Incinerators	Incinerators	1961-1996	NA
SWMU 6	Equipment Laydown	Laydown Area	1961-Present	NA
SWMU 8	Former Burn Area	Burn Area	1961-Approx. 1974	NA
SWMU 9	Sumps A, B, & C*	Sumps	1961-Present	NA
SWMU 10	Waste Oil Tank	Above-ground Storage Tank	1970s-Present	NA
SWMU 11	Waste Oil Catch Pans	Catch Pans	Approx. 1961-Present	NA
SWMU 16	Drainage Ditches	Ditches	1961-Present	NA
SWMU 17	Former IDW Drum Storage Area	Drum Storage Area	Early 1992-1993	NA
SWMU 18	Buffing Sludge Basement	Storage Basement	1961-Present	NA
SWMU 19	Buffing Sludge Rolloff	Rolloff Container	1985-Present	A, SS, SW, GW,S

* Unit Regulated by State Permit

A.2. List of solid waste management units (SWMUs) and areas of concern (AOCs) requiring a no further action at this time (continued):				
SWMU/AOC No/Letter	SWMU/AOC Name	Unit Comment	Dates of Operation	Potentially Affected Media[1]
SWMU 20	Plant Waste Containers	Hoppers and Drums	1961-Present	NA
SWMU 21	Parts Washers	Parts Washers	Jan. 1990-Present	NA
SWMU 22	Cyclone Dust	Air Emissions Control	Approx 1960 - Present	NA
SWMU 23	Biohazard Container	Container	1960s-Present	NA
SWMU 24	Satellite Accumulation Areas A_2, B_2, C_2, D_2 & E[3]	Satellite Accumulation Drums	Approx 1976 - Present	NA
SWMU 25	Scrap Metal Rolloffs	Rolloff Containers	1960s-Present	NA
SWMU 26	Trash Compactor	Compactor	1996-Present	NA

[1] Potentially Affected Media:
- A - Air
- SS- Subsurface Gas
- SW - Surface Water
- GW - Ground Water
- S - Soil
- NA - Not Applicable

[2] Sumps A, B & C are defined as follows
- A Waste Oil Sump
- B Main Waste Oil Sump
- C Verson Press Waste Oil Sump

[3] Satellite Accumulation Areas A, B, C, D & E are defined as follows:
- A Toluene Recovery Drum
- B Waste Toluene Drum
- C Spent Paint Filter Drum
- D Waste Paint Rags Ddrum
- E TCE Recovery Drum

A.3. List of solid waste management units (SWMUs) and areas of concern (AOCs) requiring Confirmatory Sampling:				
SWMU/AOC No/Letter	SWMU/AOC Name	Unit Comment	Dates of Operation	Potentially Affected Media
SWMU 13	Wastewater Treatment Plant	Treatment Plant	1977-Present	A, SS, SW, GW, S
SWMU 15	Process Sewers	Sewer System	1961-Present	A, SS, SW, GW, S
AOC C	Fuel Tank Farm Containment Area	Secondary Containment	1960s-Present	A, SS, SW, GW, S

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635 Highway 332
Grenada, Mississippi 38901

EPA I.D. No. MSD 007 037 278

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The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in any attachments) and applicable regulations contained in 40 CFR Parts 260 through 264, 266, 268, 270, and 124 as specified in the permit and statutory requirements of RCRA, as amended by HSWA. Nothing in this permit shall preclude the Regional Administrator from reviewing and modifying the permit at any time during its term in accordance with 40 CFR §270.41.

This permit is based on the premise that information and reports submitted by the Permittee prior to issuance of this permit are accurate. Any inaccuracies found in this information or information submitted as required by this permit may be grounds for termination or modification of this permit in accordance with 40 CFR §270.41, §270.42, and §270.43 and potential enforcement action. The Permittee must inform EPA of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

The authority to perform all actions necessary to issue, modify, enforce, or revoke this permit has been delegated by the Regional Administrator to the Waste Management Division Director.

This permit is effective _____, and shall remain in effect for __ years until _____, unless revoked and reissued, or terminated under 40 CFR §270.41 and §270.43 or continued in accordance with 40 CFR §270.51(a). All obligations for performance of HSWA provisions required under this permit are in effect until deemed complete by the Regional Administrator.

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Issued Date

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Richard D. Green
Acting Director
Waste Management Division

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DRAFT

I.A. EFFECT OF PERMIT

Compliance with this RCRA permit constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA except for those requirements not included in the permit which become effective by statute, are promulgated under 40 CFR Part 268 restricting placement of hazardous waste in or on the land or are promulgated under 40 CFR Part 264 of this chapter regarding leak detection systems for new and replacement surface impoundment, waste pile, and landfill units, and lateral expansions of surface impoundment, waste pile, and landfill units, as specified in 40 CFR §270.4. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of state or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Section 3008(a), 3008(h), 3004(v), 3008(c), 3007, 3013 or Section 7003 of RCRA, Sections 104, 106(a), 106(e), or 107 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9601 et seq., commonly known as CERCLA), or any other law providing for protection of public health or the environment.

I.B. PERMIT ACTIONS

This permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR §§270.41, 270.42, and 270.43 except for the Corrective Action schedule of compliance which shall be modified in accordance with Condition II.I. of this permit. The filing of a request for a permit modification, revocation and reissuance, or termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition.

I.C. SEVERABILITY

The provisions of this permit are severable, as specified in 40 CFR §124.16 and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

I.D. DUTIES AND REQUIREMENTS

I.D.1. Duty to Comply

The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance, other than noncompliance authorized by an emergency permit, constitutes a violation of RCRA and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application.

I.D.2. Duty to Reapply

If the Permittee will continue an activity allowed or required by this permit after the expiration date of this permit, the Permittee shall submit a complete application for a new permit at least one hundred eighty (180) calendar days before this permit expires, unless permission for a later date has been granted by the Regional Administrator.

I.D.3. Obligation for Corrective Action

The Permittee is required to continue this permit for any period necessary to comply with the corrective action requirements of this permit.

I.D.4. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

I.D.5. Duty to Mitigate

In the event of noncompliance with the permit, the Permittee shall take all reasonable steps to minimize releases of hazardous waste or hazardous constituents to the environment, and shall carry out such measures as are reasonable to prevent significant adverse effects on human health or the environment.

I.D.6. Proper Operation and Maintenance

The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.

I.D.7. Duty to Provide Information

The Permittee shall furnish to the Regional Administrator, within a reasonable time, any relevant information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this permit.

I.D.8. Inspection and Entry

The Permittee shall allow the Regional Administrator, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:

a. Enter at reasonable times upon the Permittee's premises where a regulated activity is located or conducted, or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated, or required under this permit; and

d. Sample or monitor at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by RCRA, any substances or parameters at any location.

I.D.9. Monitoring and Records

I.D.9.a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative waste sample to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261, the EPA Region 4 Environmental Compliance Branch's Standard Operating Procedure and Quality Assurance Manual (SOP) (most recent version), or an equivalent method

approved by the Regional Administrator. Procedures for sampling contaminated media must be those identified in the EPA Region 4 SOP or an equivalent method approved by the Regional Administrator. Laboratory methods must be those specified in the most recent edition of Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, SW-846, or an equivalent method approved by the Regional Administrator.

I.D.9.b. The Permittee shall retain at the facility, as provided for under 40 CFR Part 264, or other appropriate location as approved by the Regional Administrator, records of all monitoring information required under the terms of this permit, including all calibration and maintenance records, records of all data used to prepare documents required by this permit, copies of all reports and records required by this permit, the certification required by 40 CFR §264.73(b)(9), and records of all data used to complete the application for this permit for a period of at least three years from the date of the sample, measurement, report, certification or application, or until corrective action is completed, whichever date is later. As a generator of hazardous waste, the Permittee shall retain a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced pursuant to 40 CFR Part 268 for at least five years from the date that the waste which is the subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal, or until corrective action is completed, whichever date is later. These periods may be extended by request of the Regional Administrator at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.

I.D.9.c. Records of monitoring information shall specify:

i. The dates, exact place, and times of sampling, or measurements;

ii. The individuals who performed the sampling or measurements;

iii. The dates analyses were performed;

iv. The name of the laboratory which performed the analyses;

v. The analytical techniques or methods used; and

vi. The results of such analyses.

I.D.10. Reporting Planned Changes

The Permittee shall give written notice to the Regional Administrator as soon as possible of any planned physical alterations or additions, including Permittee initiated Interim Measures under Condition II.F.1.b., which impact known or suspected contamination at or from SWMUs or AOCs referenced in Conditions II.A.1., II.A.3., II.A.4., and II.C. The notice shall include at a minimum, a summary of the planned change, the reason for the planned change, a discussion of the impact(s) the planned change will have on the ability to investigate contamination at or from the SWMU or AOC, and a discussion of the impact(s) the planned change will have on the known or suspected contamination.

I.D.11. Anticipated Noncompliance

The Permittee shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in noncompliance with the requirements of this permit.

I.D.12. Transfer of Permit

This permit may be transferred to a new owner or operator only after notice to the Regional Administrator and only if it is modified or revoked and reissued pursuant to 40 CFR §270.40(b) or §270.41(b)(2) to identify the

new permittee and incorporate such other requirements as may be necessary under the appropriate Act. Before transferring ownership or operation of the facility during its operating life, or of a disposal facility during the post-closure care period, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264 and 270, HSWA and this permit.

I.D.13. Compliance Schedules

Written notification of compliance or noncompliance with any item identified in the compliance schedule of this permit shall be submitted according to each schedule date. If the Permittee does not notify the Regional Administrator within fourteen (14) calendar days of its compliance or noncompliance with the schedule, the Permittee shall be subject to an enforcement action. Submittal of a required item according to the schedule constitutes notification of compliance.

I.D.14. Twenty-four Hour Reporting

I.D.14.a. The Permittee shall report any noncompliance or any imminent or existing hazard from a release of hazardous waste or hazardous constituents which may endanger human health or the environment. Any such information shall be reported orally to the Regional Administrator within 24 hours from the time the Permittee becomes aware of the circumstances. This report shall include:

i. Information concerning the release of any hazardous waste or hazardous constituents which may endanger public drinking water supplies.

ii. Information concerning the release or discharge of any hazardous waste or hazardous constituents, or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility.

I.D.14.b. The description of the occurrence and its cause shall include:

i. Name, address, and telephone number of the owner or operator;

ii. Name, address, and telephone number of the facility;

iii. Date, time, and type of incident;

iv. Name and quantity of materials involved;

v. The extent of injuries, if any;

vi. An assessment of actual or potential hazard to the environment and human health outside the facility; and

vii. Estimated quantity and disposition of recovered material that resulted from the incident.

I.D.14.c. A written report shall also be provided to the Regional Administrator within fifteen (15) calendar days of the time the Permittee becomes aware of the circumstances. The written report shall contain the information specified under Conditions I.D.14.a. and b.; a description of the noncompliance or imminent hazard and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance or imminent hazard has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance or imminent hazard.

I.D.15. Other Noncompliance

The Permittee shall report all other instances of noncompliance not otherwise required to be reported above, at the time written reports as required by this permit are submitted. The reports shall contain the information listed in Condition I.D.14. as appropriate.

I.D.16. Other Information

Whenever the Permittee becomes aware that it failed to submit any relevant facts or submitted incorrect information in any document(s) submitted to the Regional Administrator, the Permittee shall promptly submit such facts or information.

I.E. SIGNATORY REQUIREMENT

All applications, reports, or information submitted to the Regional Administrator shall be signed and certified in accordance with 40 CFR §270.11.

I.F. CONFIDENTIAL INFORMATION

The Permittee may claim confidential any information required to be submitted by this permit in accordance with 40 CFR §270.12.

I.G. DEFINITIONS

For purposes of this permit, terms used herein shall have the same meaning as those in RCRA and 40 CFR Parts 124, 260, 261, 264, and 270, unless this permit specifically provides otherwise. Where terms are not defined in the regulation, the permit, or EPA guidelines or publications, the meaning associated with such terms shall be defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.

I.G.1. "Action levels" for the purposes of this permit are health-based concentrations of hazardous constituents determined to be indicators for the protection of human health and/or the environment.

I.G.2. The term "area of concern" (AOC) for purposes of this permit includes any area having a probable release of a hazardous waste or hazardous constituent which is not from a solid waste management unit and is determined by the Regional Administrator to pose a current or potential threat to human health or the environment. Such areas of concern may require investigations and remedial action as required under Section 3005(c)(3) of the Resource Conservation and Recovery Act and 40 CFR §270.32(b)(2) in order to ensure adequate protection of human health and the environment.

I.G.3. A "Corrective Action Management Unit" (CAMU) for purposes of this permit, includes any area within a facility that is designated by the Regional Administrator under part 264 Subpart S, for the purpose of implementing corrective action requirements under §264.101 and RCRA section 3008(h). A CAMU shall only be used for the management of remediation wastes pursuant to implementing such corrective action requirements at the facility.

I.G.4. "Corrective measures" for purposes of this permit, include all corrective action necessary to protect human health and the environment for all releases of hazardous waste or hazardous constituents from any solid waste management unit at the facility, regardless of the time at which waste was placed in the unit, as required under 40 CFR §264.101. Corrective measures may address releases to air, soils, surface water or groundwater.

I.G.5. "Extent of contamination" for the purposes of this permit is defined as the horizontal and vertical area in which

the concentrations of hazardous constituents in the environmental media being investigated are above detection limits or background concentrations indicative of the region, whichever is appropriate as determined by the Regional Administrator.

I.G.6. "Facility" for purposes of this permit includes all contiguous land, and structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste. A facility may consist of several treatment, storage, or disposal operational units (e.g. one or more landfills, surface impoundments, or combination of them). For the purposes of implementing corrective action under §264.101, a facility includes all contiguous property under the control of the owner or operator seeking a permit under Subtitle C of RCRA.

I.G.7. A "hazardous constituent" for purposes of this permit are those substances listed in 40 CFR Part 261 Appendix VIII and Part 264 Appendix IX.

I.G.8. "Interim Measures" for purposes of this permit are actions necessary to minimize or prevent the further migration of contaminants and limit actual or potential human and environmental exposure to contaminants while long-term corrective action remedies are evaluated and, if necessary, implemented.

I.G.9. "Land Disposal" for purposes of this permit and 40 CFR Part 268 means placement in or on the land except for a CAMU and includes, but is not limited to, placement in a landfill, surface impoundment, waste pile, injection well, land treatment facility, salt dome formation, underground mine or cave, or concrete vault or bunker intended for disposal purposes.

I.G.10. "Landfill" for the purposes of this permit includes any disposal facility or part of a facility where hazardous waste is placed in or on the land and which is not a pile, a land treatment facility, a surface impoundment, an underground injection well, a salt dome formation, a salt bed formation, an underground mine, a cave, or a corrective action management unit.

I.G.11. A "release" for purposes of this permit includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment of any hazardous waste or hazardous constituents.

I.G.12. "Remediation waste" for the purposes of this permit includes all solid and hazardous wastes, and all media (including groundwater, surface water, soils, and sediments) and debris, which contain listed hazardous wastes or which themselves exhibit a hazardous waste characteristic, that are managed for the purpose of implementing corrective action requirements under §264.101 and RCRA section 3008(h). For a given facility, remediation wastes may originate only from within the facility boundary, but may include waste managed in implementing RCRA sections 3004(v) or 3008(h) for releases beyond the facility boundary.

I.G.13. "Solid waste" means any garbage, refuse, sludge from a waste treatment plant, water supply treatment plant, or air pollution control facility and other discarded material, including solid, liquid, semisolid, or contained gaseous material resulting from industrial, commercial, mining, and agricultural operations, and from community activities, but does not include solid or dissolved material in domestic sewage, or solid or dissolved materials in irrigation return flows or industrial discharges which are point sources subject to permits under section 402 of the Federal Water Pollution Control Act, as amended (86 Stat. 880), or source, special nuclear, or by-product material as defined by the Atomic Energy Act of 1954, as amended (68 Stat. 923).

I.G.14. A "solid waste management unit" (SWMU) for the purposes of this permit includes any unit which has been used for the treatment, storage, or disposal of solid waste at any time, irrespective of whether the unit is or ever was intended for the management of solid waste. RCRA regulated hazardous waste management units are also solid waste management units. SWMUs include areas that have been contaminated by routine and systematic releases of hazardous waste or hazardous constituents, excluding one-time accidental spills that are immediately remediated and cannot be linked to solid waste management activities (e.g. product or process spills).

I.G.15. A "Temporary Unit" (TU) for the purposes of this permit includes any temporary tanks and/or container storage areas used solely for treatment or storage of hazardous remediation wastes during specific remediation activities. Designated by the Regional Administrator, such units must conform to specific standards, and may only be in operation for a period of time as specified in this permit.

I.G.16. A "unit" for the purposes of this permit includes, but is not limited to, any landfill, surface impoundment, waste pile, land treatment unit, incinerator, injection well, tank, container storage area, septic tank, drain field, wastewater treatment unit, elementary neutralization unit, transfer station, or recycling unit.

PART II - CORRECTIVE ACTION

II.A. APPLICABILITY

The Conditions of this Part apply to:

II.A.1. The solid waste management units (SWMUs) and areas of concern (AOCs) identified in Appendix A-1, which require a RCRA Facility Investigation (RFI);

II.A.2. The SWMUs and AOCs identified in Appendix A-2, which require no further investigation under this permit at this time;

II.A.3. The SWMUs and AOCs identified in Appendix A-3, which require confirmatory sampling;

II.A.4. Any additional SWMUs or AOCs discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means; As used in this Part of the permit, the terms "discover", "discovery", or "discovered" refer to the date on which the Permittee either, (1) visually observes evidence of a new SWMU or AOC, (2) visually observes evidence of a previously unidentified release of hazardous constituents to the environment, or (3) receives information which suggests the presence of a new release of hazardous waste or hazardous constituents to the environment;

II.A.5. Contamination which has migrated beyond the facility boundary, if applicable. The Permittee shall implement corrective actions beyond the facility boundary where necessary to protect human health and the environment, unless the Permittee demonstrates to the satisfaction of the Regional Administrator that, despite the Permittee's best efforts, as determined by the Regional Administrator, the Permittee was unable to obtain the necessary permission to undertake such actions. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the facility boundary where off-site access is denied. On-site measures to address such releases will be determined on a case-by-case basis. Assurances of financial responsibility for completion of such off-site corrective action will be required.

II.B. NOTIFICATION AND ASSESSMENT REQUIREMENTS FOR NEWLY IDENTIFIED SWMUs AND AOCs

II.B.1. The Permittee shall notify the Regional Administrator in writing, within fifteen (15) calendar days of discovery, of any suspected new AOC as discovered under Condition II.A.4. The notification shall include, at a minimum, the location of the AOC and all available information pertaining to the nature of the release (e.g., media affected, hazardous constituents released, magnitude of release, etc.). The Regional Administrator may conduct, or require the Permittee to conduct, further assessment (i.e., Confirmatory Sampling) in order to determine the status of the suspected AOC. The Regional Administrator will notify the Permittee in writing of the final determination as to the status of the suspected AOC. If the Regional Administrator determines that further investigation of an AOC is required, the permit will be modified in accordance with 40 CFR §270.41.

II.B.2. The Permittee shall notify the Regional Administrator in writing, within fifteen (15) calendar days of discovery, of any additional SWMU as discovered under Condition II.A.4.

II.B.3. The Permittee shall prepare and submit to the Regional Administrator, within ninety (90) calendar days of notification, a SWMU Assessment Report (SAR) for each SWMU identified under Condition II.B.2. At a minimum, the SAR shall provide the following information:

a. Location of unit(s) on a topographic map of appropriate scale such as required under 40 CFR §270.14(b)(19).

b. Designation of type and function of unit(s).

c. General dimensions, capacities and structural description of unit(s) (supply any available plans/drawings).

d. Dates that the unit(s) was operated.

e. Specification of all wastes that have been managed at/in the unit(s) to the extent available. Include any available data on hazardous constituents in the wastes.

f. All available information pertaining to any release of hazardous waste or hazardous constituents from such unit(s) (to include groundwater data, soil analyses, air, and/or surface water data).

II.B.4. Based on the results of the SAR, the Regional Administrator shall determine the need for further investigations at the SWMUs covered in the SAR. If the Regional Administrator determines that such investigations are needed, the Permittee shall be required to prepare a plan for such investigations as outlined in Condition II.E.1.b. or II.D.2.

II.C. NOTIFICATION REQUIREMENTS FOR NEWLY DISCOVERED RELEASES FROM SWMUs or AOCs

II.C.1. The Permittee shall notify the Regional Administrator in writing of any newly discovered release(s) of hazardous waste or hazardous constituents discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means, within fifteen (15) calendar days of discovery. Such newly discovered releases may be from SWMUs or AOCs identified in Condition II.A.2. or SWMU or AOCs identified in Condition II.A.4. for which further investigation under Condition II.B.4. was not required.

II.C.2. If the Regional Administrator determines that further investigation of the SWMUs or AOCs is needed, the Permittee shall be required to prepare a plan for such investigations as outlined in Condition II.E.1.b.

II.D. CONFIRMATORY SAMPLING (CS)

II.D.1. The Permittee shall prepare and submit a Confirmatory Sampling (CS) Work Plan for each unit identified under Condition II.A.3. The CS Work Plan shall be submitted within forty-five (45) calendar days from the effective date of this permit. The CS Work Plan shall include schedules of implementation and completion of specific actions necessary to determine whether or not a release has occurred. It should also address applicable requirements and affected media. In order to partly or wholly satisfy the CS requirement, previously existing data may be submitted with the work plan for the Regional Administrator's consideration.

II.D.2. Upon notification by the Regional Administrator, the Permittee shall prepare and submit a Confirmatory Sampling (CS) Work Plan for suspected AOCs per Condition II.B.1. or newly identified SWMUs per Condition II.B.4. The work plan shall be submitted within forty-five (45) calendar days of notification by the Regional Administrator that a CS Work Plan is required. The CS Work Plan shall meet the basic requirements listed in Condition II.D.1.

II.D.3. The CS Work Plan must be approved by the Regional Administrator, in writing, prior to implementation. The Regional Administrator shall specify the start date of the CS Work Plan schedule in the letter approving the CS Work Plan. If the Regional Administrator disapproves the CS Work Plan, the Regional Administrator shall either (1) notify the Permittee in writing of the CS Work Plan's deficiencies and specify a due date for submission of a revised CS Work Plan, (2) revise the CS Work Plan and notify the Permittee of the revisions, or (3) conditionally approve the CS Work Plan and notify the Permittee of the conditions.

II.D.4. The Permittee shall implement the confirmatory sampling in accordance with the approved CS Work Plan.

II.D.5. The Permittee shall prepare and submit to the Regional Administrator in accordance with the schedule in the approved CS Work Plan, a Confirmatory Sampling (CS) Report identifying all SWMUs or AOCs that have released hazardous waste or hazardous constituents into the environment. The CS Report shall include all data, including raw data, and a summary and analysis of the data, that supports the above determination. If submittal of the CS Report coincides with submittal of the RFI Report, then the CS Report and the RFI Report may be combined into one submittal.

II.D.6. Based on the results of the CS Report, the Regional Administrator shall determine the need for further investigations at the SWMUs or AOCs covered in the CS Report. If the Regional Administrator determines that such investigations are needed, the Permittee shall be required to prepare a plan for such investigations as outlined in Condition II.E.1.b. The Regional Administrator will notify the Permittee of any no further action decision.

II.E. RCRA FACILITY INVESTIGATION (RFI)

II.E.1. RFI Work Plan(s)

II.E.1.a. The Permittee shall prepare and submit to the Regional Administrator, within ninety (90) calendar days of the effective date of this permit, a RCRA Facility Investigation (RFI) Work Plan(s) for those units identified in Condition II.A.1. This Work Plan shall be developed to meet the requirements of Condition II.E.1.c.

II.E.1.b. The Permittee shall prepare and submit to the Regional Administrator, within ninety (90) calendar days of notification by the Regional Administrator, an RFI Work Plan for those units identified under Condition II.B.4., Condition II.C.2., or Condition II.D.6. The RFI Work Plan(s) shall be developed to meet the requirements of Condition II.E.1.c.

II.E.1.c. The RFI Work Plan(s) shall meet the requirements of Appendix B. The RFI Work Plan(s) shall include schedules of implementation and completion of specific actions necessary to determine the nature and extent of contamination and the potential pathways of contaminant releases to the air, soil, surface water, and groundwater. The Permittee must provide sufficient justification and associated documentation that a release is not probable or has already been characterized if a unit or a media/pathway associated with a unit (groundwater, surface water, soil, subsurface gas, or air) is not included in the RFI Work Plan(s). Such deletions of a unit, media or pathway from the RFI(s) are subject to the approval of the Regional Administrator. The Permittee shall provide sufficient written justification for any omissions or deviations from the minimum requirements of Appendix B. Such omissions or deviations are subject to the approval of the Regional Administrator. In addition, the scope of the RFI Work Plan(s) shall include all investigations necessary to ensure compliance with 40 CFR §264.101(c).

II.E.1.d. The RFI Work Plan(s) must be approved by the Regional Administrator, in writing, prior to implementation. The Regional Administrator shall specify the start date of the RFI Work Plan schedule in the letter approving the RFI Work Plan(s). If the Regional Administrator disapproves the RFI Work Plan(s), the Regional Administrator shall either (1) notify the Permittee in writing of the RFI Work Plan's deficiencies and specify a due date for submission of a revised RFI Work Plan, (2) revise the RFI Work Plan and notify the Permittee of the revisions and the start date of the schedule within the approved RFI Work Plan, or (3) conditionally approve the RFI Work Plan and notify the Permittee of the conditions.

II.E.2. RFI Implementation

The Permittee shall implement the RFI(s) in accordance with the approved RFI Work Plan(s) and Appendix B. The Permittee shall notify the Regional Administrator at least twenty (20) days prior to any sampling activity.

II.E.3. RFI Reports

II.E.3.a. The Permittee shall prepare and submit to the Regional Administrator Draft and Final RCRA Facility Investigation Report(s) for the investigations conducted pursuant to the RFI Work Plan(s) submitted under Condition II.E.1. The Draft RFI Report(s) shall be submitted to the Regional Administrator for review in accordance with the schedule in the approved RFI Work Plan(s). The Final RFI Report(s) shall be submitted to the Regional Administrator within thirty (30) calendar days of receipt of the Regional Administrator's final comments on the Draft RFI Report. The RFI Report(s) shall include an analysis and summary of all required investigations of SWMUs and AOCs and their results. The summary shall describe the type and extent of contamination at the facility, including sources and migration pathways, identify all hazardous constituents present in all media, and describe actual or potential receptors. The RFI Report(s) shall also describe the extent of contamination (qualitative/quantitative) in relation to background levels indicative of the area. If the Draft RFI Report is a summary of the initial phase investigatory work, the report shall include a work plan for the final phase investigatory actions required based on the initial findings. Approval of the final phase work plan shall be carried out in accordance with Condition II.E.1.d. The objective of this task shall be to ensure that the investigation data are sufficient in quality (e.g., quality assurance procedures have been followed) and quantity to describe the nature and extent of contamination, potential threat to human health and/or the environment, and to support a Corrective Measures Study, if necessary.

II.E.3.b. The Permittee shall prepare and submit to the Regional Administrator, along with the Draft and Final RFI Report(s), action levels for each of the hazardous constituents reported in Condition II.E.3.a. Action levels shall be calculated as specified in Appendix E of this permit.

II.E.3.c. The Regional Administrator will review the RFI Report(s), including the action levels described in Condition II.E.3.b. The Regional Administrator shall notify the Permittee of the need for further investigative action if necessary and, if appropriate at this moment of the investigation, inform the Permittee, if not already notified, of the need for a Corrective Measures Study to meet the requirements of II.G and 40 CFR §264.101. The Regional Administrator will notify the permittee of any no further action decision. Any further investigative action required by the Regional Administrator shall be prepared and submitted in accordance with a schedule specified by the Regional Administrator and approved in accordance with Condition II.E.1.d.

II.E.3.d. If the time required to conduct the RFI(s) is greater than one hundred eighty (180) calendar days, the Permittee shall provide the Regional Administrator with quarterly RFI Progress Reports (90 day intervals) beginning ninety (90) calendar days from the start date specified by the Regional Administrator in the RFI Work Plan approval letter. The Progress Reports shall contain the following information at a minimum:

i. A description of the portion of the RFI completed;

ii. Summaries of findings;

iii. Summaries of any deviations from the approved RFI Work Plan during the reporting period;

iv. Summaries of any significant contacts with local community public interest groups or State government;

v. Summaries of any problems or potential problems encountered during the reporting period;

vi. Actions taken to rectify problems;

vii. Changes in relevant personnel;

viii. Projected work for the next reporting period; and

ix. Copies of daily reports, inspection reports, data, etc.

II.F. INTERIM MEASURES (IM)

II.F.1. IM Work Plan

II.F.1.a. Upon notification by the Regional Administrator, the Permittee shall prepare and submit an Interim Measures (IM) Work Plan for any SWMU or AOC which the Regional Administrator determines is necessary. IM are necessary in order to minimize or prevent the further migration of contaminants and limiting actual or potential human and environmental exposure to contaminants while long-term corrective action remedies are evaluated and, if necessary, implemented. The IM Work Plan shall be submitted within thirty (30) calendar days of such notification and shall include the elements listed in II.F.1.b. Such interim measures may be conducted concurrently with investigations required under the terms of this permit.

II.F.1.b. The Permittee may initiate IM at a SWMU or AOC by submitting the appropriate notification pursuant to Condition I.D.10. The Regional Administrator will process Permittee initiated IM by either conditionally approving the IM or imposing an IM Work Plan per Condition II.F.1.a. Permittee-initiated IM shall be considered conditionally approved unless the Regional Administrator specifically imposes an IM Work Plan within thirty (30) calendar days of receipt of notification of the Permittee initiated IM. The scope and success of Permittee initiated IM conditionally approved per Condition II.F.1.b. shall be subject to subsequent in-depth review; the Regional Administrator will either comment on or approve the Permittee initiated IM. Permittee initiated IM must follow the progress and final reporting requirements in Condition II.F.3.

II.F.1.c. The IM Work Plan shall ensure that the interim measures are designed to mitigate any current or potential threat(s) to human health or the environment and is consistent with and integrated into any long-term solution at the facility. The IM Work Plan shall include: the interim measures objectives, procedures for implementation (including any designs, plans, or specifications), and schedules for implementation.

II.F.1.d. The IM Work Plan imposed under Condition II.F.1.a. must be approved by the Regional Administrator, in writing, prior to implementation. The Regional Administrator shall specify the start date of the IM Work Plan schedule in the letter approving the IM Work Plan. If the Regional Administrator disapproves the IM Work Plan, the Regional Administrator shall either (1) notify the Permittee in writing of the IM Work Plan's deficiencies and specify a due date for submission of a revised IM Work Plan, (2) revise the IM Work Plan and notify the Permittee of the revisions and the start date of the schedule within the approved IM Work Plan, or (3) conditionally approve the IM Work Plan and notify the Permittee of the conditions.

II.F.2. IM Implementation

II.F.2.a. The Permittee shall implement the interim measures imposed under Condition II.F.1.a. in accordance with the approved IM Work Plan.

II.F.2.b. The Permittee shall give notice to the Regional Administrator as soon as possible of any planned changes, reductions or additions to the IM Work Plan imposed under Condition II.F.1.a. or initiated by the Permittee under Condition II.F.1.b.

II.F.2.c. Final approval of corrective action required under 40 CFR §264.101 which is achieved through interim measures shall be in accordance with 40 CFR §270.41 and Condition II.H. as a permit modification.

II.F.3. IM Reports

II.F.3.a. If the time required for completion of interim measures imposed under Condition II.F.1.a. or implemented under Condition II.F.1.b. is greater than one year, the Permittee shall provide the Regional Administrator with progress reports at intervals specified in the approved Work Plan or semi-annually for Permittee initiated interim measures. The Progress Reports shall contain the following information at a minimum:

i. A description of the portion of the interim measures completed;

ii. Summaries of findings;

iii. Summaries of any deviations from the IM Work Plan during the reporting period;

iv. Summaries of any problems or potential problems encountered during the reporting period; and

v. Projected work for the next reporting period.

II.F.3.b. The Permittee shall prepare and submit to the Regional Administrator, within ninety (90) calendar days of completion of interim measures conducted under Condition II.F., an Interim Measures (IM) Report. The IM Report shall contain the following information at a minimum:

i. A description of interim measures implemented;

ii. Summaries of results;

iii. Summaries of all problems encountered;

iv. Summaries of accomplishments and/or effectiveness of interim measures; and

v. Copies of all relevant laboratory/monitoring data, etc. in accordance with Condition I.D.9.

II.G. CORRECTIVE MEASURES STUDY

II.G.1. Corrective Measures Study (CMS) Work Plan

II.G.1.a. The Permittee shall prepare and submit a CMS Work Plan for those units requiring a CMS within ninety (90) calendar days of notification by the Regional Administrator that a CMS is required. This CMS Work Plan shall be developed to meet the requirements of Condition II.G.1.b. The Permittee may seek approval from the Regional Administrator for concurrent RFI/CMS. The CMS may be performed concurrent with the RFI process if the Regional Administrator determines that sufficient investigative details are available to allow concurrent action.

II.G.1.b. The CMS Work Plan shall meet the requirements of Appendix C at a minimum. The CMS Work Plan shall include schedules of implementation and completion of specific actions necessary to complete a CMS. The Permittee must provide sufficient justification and/or documentation for any unit deleted from the CMS Work Plan. Such deletion of a unit is subject to the approval of the Regional Administrator. The CMS shall be conducted in accordance with the approved CMS Work Plan. The Permittee shall provide sufficient written justification for any omissions or deviations from the minimum requirements of Appendix C. Such omissions or deviations are subject to the approval of the Regional Administrator. The scope of the CMS Work Plan shall include all investigations necessary to ensure compliance with 3005(c)(3), 40 CFR §264.101, §264.552, and §270.32(b)(2). The Permittee shall implement corrective actions beyond the facility boundary, as set forth in Condition II.A.5.

II.G.1.c. The Regional Administrator shall either approve or disapprove, in writing, the CMS Work Plan. If the Regional Administrator disapproves the CMS Work Plan, the Regional Administrator shall either (1) notify the Permittee in writing of the CMS Work Plan's deficiencies and specify a due date for submittal of a revised CMS Work Plan, (2) revise the CMS Work Plan and notify the Permittee of the revisions, or (3) conditionally approve the CMS Work Plan and notify the Permittee of the conditions. This modified CMS Work Plan becomes the approved CMS Work Plan.

II.G.2. Corrective Measures Study Implementation

The Permittee shall begin to implement the Corrective Measures Study according to the schedules specified in the CMS Work Plan, no later than fifteen (15) calendar days after the Permittee has received written approval from the Regional Administrator for the CMS Work Plan. Pursuant to Permit Condition II.G.1.b. the CMS shall be conducted in accordance with the approved CMS Work Plan.

II.G.3. CMS Report

II.G.3.a. The Permittee shall prepare and submit to the Regional Administrator a draft and final CMS Report for the study conducted pursuant to the approved CMS Work Plan and in accordance with Appendix C. The draft CMS Report shall be submitted to the Regional Administrator in accordance with the schedule in the approved CMS Work Plan. The final CMS Report shall be submitted to the Regional Administrator within thirty (30) days of receipt of the Regional Administrator's final comments on the draft CMS Report. The CMS Report shall summarize any bench-scale or pilot tests conducted. The CMS Report must include an evaluation of each remedial alternative. If a remedial alternative requires the use of a CAMU, the CMS report shall include all information necessary to establish and implement the CAMU. The CMS Report shall present all information gathered under the approved CMS Work Plan. The CMS Final Report must contain adequate information to support the Regional Administrator's decision on the recommended remedy, described under Permit Condition II.H.

II.G.3.b. If the Regional Administrator determines that the CMS Final Report does not fully satisfy the information requirements specified under Permit Condition II.G.3.a., the Regional Administrator may disapprove the CMS Final Report. If the Regional Administrator disapproves the CMS Final Report, the Regional Administrator shall notify the Permittee in writing of deficiencies in the CMS Final Report and specify a due date for submittal of a revised CMS Final Report. The Regional Administrator will notify the Permittee of any no further action decision.

II.G.3.c. As specified under Permit Condition II.G.3.b., based on preliminary results and the CMS Final Report, the Regional Administrator may require the Permittee to evaluate additional remedies or particular elements of one or more proposed remedies.

II.H. REMEDY APPROVAL AND PERMIT MODIFICATION

II.H.1. A remedy shall be selected from the remedial alternatives evaluated in the CMS. It will be based at a minimum on protection of human health and the environment, as per specific site conditions and existing regulations. The selected remedy may include any interim measures implemented to date.

II.H.2. Pursuant to 40 CFR §270.41, a permit modification will be initiated by the Regional Administrator after recommendation of a remedy under Condition II.H.1. This modification will serve to incorporate a final remedy, including a CAMU if necessary, into this permit.

II.H.3. Within one hundred and twenty (120) calendar days after this Permit has been modified for remedy selection, the Permittee shall demonstrate financial assurance for completing the approved remedy.

II.I. MODIFICATION OF THE CORRECTIVE ACTION SCHEDULE OF COMPLIANCE

II.I.1. If at any time the Regional Administrator determines that modification of the Corrective Action Schedule of Compliance is necessary, the Regional Administrator may initiate a modification to the Schedule of Compliance (Appendix D).

II.I.2. Modifications that are initiated and finalized by the Regional Administrator will be in accordance with the applicable provisions of 40 CFR Part 270. The Permittee may also request a permit modification in accordance with 40 CFR Part 270 to change the Schedule of Compliance.

II.J. WORK PLAN AND REPORT REQUIREMENTS

II.J.1. All work plans and schedules shall be subject to approval by the Regional Administrator prior to implementation to assure that such work plans and schedules are consistent with the requirements of this Permit and with applicable regulations. The Permittee shall revise all submittals and schedules as specified by the Regional Administrator. Upon approval the Permittee shall implement all work plans and schedules as written.

II.J.2. All work plans and reports shall be submitted in accordance with the approved schedule. Extensions of the due date for submittals may be granted by the Regional Administrator based on the Permittee's demonstration that sufficient justification for the extension exists.

II.J.3. If the Permittee at any time determines that the SAR information required under Condition II.B., the CS Work Plan under Condition II.D., or RFI Work Plan(s) required under Condition II.E. no longer satisfy the requirements of 40 CFR §264.101 or this permit for prior or continuing releases of hazardous waste or hazardous constituents from solid waste management units and/or areas of concern, the Permittee shall submit an amended Work Plan(s) to the Regional Administrator within ninety (90) calendar days of such determination.

II.J.4. Three (3) copies of all reports and work plans shall be provided by the Permittee to the Regional Administrator in care of the RCRA Branch Chief at the following address:

Chief, RCRA Programs Branch
Waste Management Division
U.S. Environmental Protection Agency
Region 4
61 Forsyth Street
Atlanta, Georgia 30303

II.K. APPROVAL/DISAPPROVAL OF SUBMITTALS

II.K.1. The Regional Administrator will review the work plans, reports, schedules, and other documents ("submittals") which require the Regional Administrator's approval in accordance with the conditions of this permit. The Regional Administrator will notify the Permittee in writing of any submittal that is disapproved, and the basis therefore. Condition II.L. shall apply only to submittals that have been disapproved and revised by the Regional Administrator, or that have been disapproved by the Regional Administrator, then revised and resubmitted by the Permittee, and again disapproved by the Regional Administrator.

II.L. DISPUTE RESOLUTION

Notwithstanding any other provision in this permit, in the event the Permittee disagrees, in whole or in part, with the Regional Administrator's revision of a submittal or disapproval of any revised submittal required by the permit, the following may, at the Permittee's discretion, apply:

II.L.1.a. In the event that the Permittee chooses to invoke the provisions of this section, the Permittee shall notify the Regional Administrator in writing within thirty (30) days of receipt of the Regional Administrator's revision of a submittal or disapproval of a revised submittal. Such notice shall set forth the specific matters in dispute, the position the Permittee asserts should be adopted as consistent with the requirements of the permit, the basis for the Permittee's position, and

any matters considered necessary for the Regional Administrator's determination.

II.L.1.b. The Regional Administrator and the Permittee shall have an additional thirty (30) days from EPA's receipt of the notification provided for in Condition II.L.1.a. to meet or confer to resolve any disagreement.

II.L.1.c. In the event agreement is reached, the Permittee shall comply with the terms of such agreement or if appropriate submit the revised submittal and implement the same in accordance with and within the time frame specified in such agreement.

II.L.1.d. If agreement is not reached within the thirty (30) day period, the Regional Administrator will notify the Permittee in writing of his/her decision on the dispute, and the Permittee shall comply with the terms and conditions of the Regional Administrator's decision in the dispute. For the purposes of this provision in this permit, the responsibility for making this decision shall not be delegated below the Waste Management Division Director.

II.L.1.e. With the exception of those conditions under dispute, the Permittee shall proceed to take any action required by those portions of the submission and of the permit that the Regional Administrator determines are not affected by the dispute.

PART III - LAND DISPOSAL RESTRICTIONS

III.A. GENERAL RESTRICTIONS

III.A.1. 40 CFR Part 268 identifies hazardous wastes that are restricted from land disposal and defines those limited circumstances under which an otherwise prohibited waste may continue to be placed on or in a land treatment, storage or disposal unit. The Permittee shall maintain compliance with the requirements of 40 CFR Part 268. Where the Permittee has applied for an extension, waiver or variance under 40 CFR Part 268, the Permittee shall comply with all restrictions on land disposal under this Part once the effective date for the waste has been reached pending final approval of such application.

III.B. LAND DISPOSAL PROHIBITIONS AND TREATMENT STANDARDS

III.B.1. A restricted waste identified in 40 CFR Part 268 Subpart C may not be placed in a land disposal unit without further treatment unless the requirements of 40 CFR Part 268 Subparts C and/or D are met.

III.B.2. The storage of hazardous wastes restricted from land disposal under 40 CFR Part 268 is prohibited unless the requirements of 40 CFR Part 268 Subpart E are met.

PART IV - RCRA ORGANIC AIR EMISSION REQUIREMENTS

IV.A. APPLICABILITY

IV.A.1. 40 Cfr Subpart CC applies to all tanks, containers and surface impoundments identified in the State RCRA permit, except as provided for in 40 CFR § 264.1 and § 264.1080(b).

IV.A.2. The Conditions of this Part apply to hazardous waste management units identified below and also in Appendix F, for which required control equipment has been installed and is operational or are exempt from Subpart CC standards under § 264.1082(c).

[*Fill out table with site-specific information obtained from Part B and/or State permit, information provided below is for example only*]

Table IV.A.2. Hazardous Waste Management Units for Which Subpart CC Emissions Controls are Installed

HWMU Designation/ Identificatron Number	HWMU Type	Description of Air Emission Control System
There are no hazardous waste management units for which Subpart CC emissions controls are installed.		

II.B. EMISSION CONTROL TECHNOLOGY

The Permittee shall install and maintain all regulated units and associated emission control technology in accordance with the detailed plans, schedules, information and reports as contained in the (cite part B permit application).

II.C. GENERAL STANDARDS

The Permittee shall comply with the applicable requirements of 40 CFR Part 264, Subpart CC. If the Organic Air Emission control equipment is not installed and operational by December 6, 1996, the Permittee is required to submit a Schedule for Implementation in accordance 40 CFR § 265.1082. The Schedule for Implementation shall indicate that the Organic Air Emission Control equipment be installed and operational as soon as possible, but no later than December 8, 1997 for units subject to Subpart CC, except controls on tanks used for stabilization, and June 8, 1998 for tanks used for stabilization that are subject to Subpart CC. The Permittee shall comply with 40 CFR Part 265, Subpart CC until such time the Organic Air Emission Control equipment is installed and operational. Upon approval of the final Organic Air Emissions Control Option, this Permit will be modified in accordance with 40 CFR § 270.42.

II.D. REPORTING REQUIREMENTS

II.D.1. For each tank, container or miscellaneous unit which manages hazardous waste that is exempted from using air emission controls, a written report shall be submitted to the Regional Administrator within fifteen (15) days of each occurrence when hazardous waste is placed in the waste management unit in noncompliance with the Conditions of 40 CFR §§ 264.1082(c)(1) or (c)(2), as applicable. The written report shall contain the EPA identification number, facility

name and address, a description of the noncompliance event and the cause, the dates of the noncompliance, and the actions taken to correct the noncompliance and prevent reoccurrence of the noncompliance.

II.D.2. For tanks listed in Conditions II.A.2., which use air emission controls in accordance with the requirements 40 CFR § 264.1084(c), a written report shall be submitted to the Regional Administrator within fifteen (15) days of each occurrence when hazardous waste is managed in the tank in noncompliance with the Conditions specified in 40 CFR § 264.1084(c)(1) through (c)(4). The written report shall contain the EPA identification number, facility name and address, a description of the noncompliance event and the cause, the dates of the noncompliance, and the actions taken to correct the noncompliance and prevent reoccurrence of the noncompliance.

II.D.3. For control devices used in accordance with the requirements of 40 CFR § 264.1087, a semiannual written report shall be submitted to the Regional Administrator except as provided for in Condition II.D.4. of this Part. The report shall describe each occurrence during the previous 6-month period when a control device is operated continuously for 24 hours or longer in noncompliance with the applicable operating values defined in 40 CFR § 264.1035(c)(4) or when a flare is operated with visible emissions as defined in 40 CFR § 264.1033(d). The written report shall include the EPA identification number, facility name and address, and an explanation why the control device could not be returned to compliance within 24 hours, and actions taken to correct the noncompliance.

II.D.4. A report to the Regional Administrator in accordance with the requirements of Condition II.D.3. of this Part is not required for a 6-month period during which all control devices subject to 40 CFR Part 264, Subpart CC are operated by the owner or operator such that during no period of 24 hours or longer did a control device operate continuously in noncompliance with the applicable operating values defined in 40 CFR § 264.1035(c)(4) of this part or a flare operate with visible emissions as defined in 40 CFR § 264.1033(d).

II.D.5. All reports shall be signed and dated by an authorized representative of the Permittee as per 40 CFR § 270.11(b).

II.E. NOTIFICATION OF NEW UNITS

Prior to installing any tank, container, surface impoundment or miscellaneous unit subject to 40 CFR Part 264, Subpart CC, or modifying an existing process, waste handling or tank or container such that the unit(s) will become subject to 40 CFR Part 264 Subpart CC, the Permittee shall apply for a permit modification under § 270.42, and provide specific Part B application information required under 40 CFR §§ 270.14-17 and § 270.27, as applicable, with the modification request.

APPENDICES

APPENDIX A

SOLID WASTE MANAGEMENT UNIT SUMMARY

A.1. List of solid waste management units (SWMUs) and areas of concern (AOCs) requiring a RCRA Facility Investigation (RFI):

SWMU/AOC No/Letter	SWMU/AOC Name	Unit Comment	Dates of Operation	Potentially Affected Media[1]
SWMU 2	Equalization Lagoon	Surface Impoundment	1961-1994	A, SS, SW, GW, S
SWMU 3	On-Site Landfill	Landfill	1961-1967	A, SS, SW, GW, S
SWMU 4	Sludge Lagoon	Surface Impoundment	1977-Present	A, SS, SW, GW, S
SWMU 7	Outfall Ditch	Ditch	1961-Present	A, SS, SW, GW, S
SWMU 12	Wet Well	Inground Tank	1977-Present	A, SS, SW, GW, S
SWMU 14	Destruct Pit	Chromium Reduction Unit/ Holding Sump	1961-Present	A, SS, SW, GW, S
AOC A	Forner TCE Storage Area	Contamination Area	≈1973-Present	A, SS, SW, GW, S
AOC B	Former Toluene UST Area	Contamination Area	Late 1960s-Present	A, SS, SW, GW, S

[1]Potentially Affected Media:

A - Air
SS- Subsurface Gas
SW - Surface Water
GW - Ground Water
S - Soil

A.2. List of solid waste management units (SWMUs) and areas of concern (AOCs) requiring no further action at this time:

SWMU/AOC No/Letter	SWMU/AOC Name	Unit Comment and Basis for NFA	Dates of Operation	Potentially Affected Media [1]
SWMU 1	Less Than 90-day Drum Storage Area	Container Storage Area	Mid 1980s-Present	NA
SWMU 5	Former Solid Waste Incinerators	Incinerators	1961-1996	NA
SWMU 6	Equipment Laydown	Laydown Area	1961-Present	NA
SWMU 8	Former Burn Area	Burn Area	1961-Approx. 1974	NA
SWMU 9	Sumps A, B, & C[2]	Sumps	1961-Present	NA
SWMU 10	Waste Oil Tank	Above-ground Storage Tank	1970s-Present	NA
SWMU 11	Waste Oil Catch Pans	Catch Pans	Approx. 1961-Present	NA
SWMU 16	Drainage Ditches	Ditches	1961-Present	NA
SWMU 17	Former IDW Drum Storage Area	Drum Storage Area	Early 1992-1993	NA
SWMU 18	Buffing Sludge Basement	Storage Basement	1961-Present	NA
SWMU 19	Buffing Sludge Rolloff	Rolloff Container	1985-Present	A, SS, SW, GW,S

* Unit Regulated by State Permit

A.2. List of solid waste management units (SWMUs) and areas of concern (AOCs) requiring a no further action at this time (continued):

SWMU/AOC No/Letter	SWMU/AOC Name	Unit Comment	Dates of Operation	Potentially Affected Media[1]
SWMU 20	Plant Waste Containers	Hoppers and Drums	1961-Present	NA
SWMU 21	Parts Washers	Parts Washers	Jan. 1990-Present	NA
SWMU 22	Cyclone Dust	Air Emissions Control	Approx 1960 - Present	NA
SWMU 23	Biohazard Container	Container	1960s-Present	NA
SWMU 24	Satellite Accumulation Areas A_2, B_2, C_2, D_2 & E[3]	Satellite Accumulation Drums	Approx 1976 - Present	NA
SWMU 25	Scrap Metal Rolloffs	Rolloff Containers	1960s-Present	NA
SWMU 26	Trash Compactor	Compactor	1996-Present	NA

[1] Potentially Affected Media:
- A - Air
- SS- Subsurface Gas
- SW - Surface Water
- GW - Ground Water
- S - Soil
- NA - Not Applicable

[2] Sumps A, B & C are defined as follows
- A Waste Oil Sump
- B Main Waste Oil Sump
- C Verson Press Waste Oil Sump

[3] Satellite Accumulation Areas A, B, C, D & E are defined as follows:
- A Toluene Recovery Drum
- B Waste Toluene Drum
- C Spent Paint Filter Drum
- D Waste Paint Rags Ddrum
- E TCE Recovery Drum

A.3. List of solid waste management units (SWMUs) and areas of concern (AOCs) requiring Confirmatory Sampling:

SWMU/AOC No/Letter	SWMU/AOC Name	Unit Comment	Dates of Operation	Potentially Affected Media
SWMU 13	Wastewater Treatment Plant	Treatment Plant	1977-Present	A, SS, SW, GW, S
SWMU 15	Process Sewers	Sewer System	1961-Present	A, SS, SW, GW, S
AOC C	Fuel Tank Farm Containment Area	Secondary Containment	1960s-Present	A, SS, SW, GW, S

[1]Potentially Affected Media:

A - Air
SS- Subsurface Gas
SW - Surface Water
GW - Ground Water
S - Soil

APPENDIX B

RCRA FACILITY INVESTIGATION (RFI) OUTLINE

APPENDIX B

RCRA FACILITY INVESTIGATION (RFI) OUTLINE

The purpose of the RFI portion of the RCRA corrective action process is to evaluate the nature and extent of releases of hazardous wastes and/or hazardous constituents and to gather necessary data to support the Corrective Measures Study (CMS) and/or Interim Measures. Planning for the investigation is best accomplished through a logical progression of tasks:

1. gather information on the source of the release(s) to the environment (Source Characterization),
2. gather information on the physical aspects of the environment which will affect the migration and fate of the release and identification of exposure pathways for both humans and non-human members of the environment (Environmental Setting),
3. use Source Characterization and Environmental Setting to develop a conceptual model of the release which will be used to plan and conduct a program to define the nature, rate and extent of the release (Sampling and Analysis Plan).

An RFI Work Plan and RFI Report are generally required elements of the RCRA corrective action process. The requirements for a full, detailed RFI are listed in this Appendix. EPA recognizes that each facility is unique. Therefore, the scope and requirements of the RFI shall be focused to fit the complexity of the site-specific situation. The work plan requirements listed in this Appendix in no way limit the site-specific opportunities for a Permittee. For example, the RFI may be implemented in phases. Relevant information contained in previously developed documents, such as a RCRA Part B permit application, may be referenced as appropriate, but must be summarized in either the RFI Work Plan or the RFI Report. In addition, EPA understands that Risk Assessments are becoming more widely utilized to place characterization information into context and to aid in determining remedial solutions. If a Risk Assessment is expected to be performed in the future, note that Region 4 has developed a series of Risk Bulletins to provide Permittees and their contractors with the general format and process Region 4 expects a Risk Assessment to follow.

In some cases, it may be possible to implement the RFI concurrent with the CMS (also see Appendix C). This approach can save time and money because the earlier in the corrective action process potential remedies can be identified, the more effectively information gathering can be focused. The Agency anticipates that a concurrent RFI/CMS approach may be appropriate in the following types of situations, among others: facilities where removal remedies have been proposed by the owner/operator, facilities with straightforward remedial solutions or where presumptive remedies can be applied, facilities where few remedial options are available, and facilities where the remedy is phased. The Agency will determine on a case-by-case basis if a concurrent RFI/CMS is appropriate. Because of the unique data collection requirements necessary for a remedial solution which includes natural attenuation of contaminants in groundwater, if natural attenuation is expected to be part of the remedial solution, then the Sampling and Analysis Plan should be crafted to include monitoring of specific water quality parameters unique to natural attenuation (e.g., nitrites/nitrates, ferrous iron, sulfides, dissolved oxygen, methane, hydrogen, etc.).

I. RFI WORK PLAN REQUIREMENTS - ELEMENTS OF THE RFI WORK PLAN

The RFI Work Plan shall include, at a minimum, the following elements:

A. Introduction - Summary of any relevant existing assessment data

The Permittee shall describe the purpose or objective of the RFI Work Plan and provide a summary of any existing environmental data which is relevant to the investigation. The summary should provide the following items, at a minimum:

1. land ownership history,
2. facility operating dates,

3. facility's product(s),
4. raw materials used in facility operations, wastes generated,
5. nature and extent of any known contamination,
6. summary of an ongoing Interim Measures and past assessments,
7. summary of permit objective and how this objective will be satisfied.

B. Environmental Setting

The Permittee shall provide information on the environmental setting at the facility. The Permittee shall characterize the Environmental Setting as it relates to identified sources, pathways and areas of releases of hazardous constituents from Solid Waste Management Units (SWMUs) and/or Areas of Concern (AOCs). Data gaps pertinent to characterization of releases shall be identified and provisions made in Section E to obtain the relevant information to fill the data gap. The Environmental Setting shall cover the following items, at a minimum:

1. Hydrogeology

The Permittee shall provide a summary of the hydrogeologic conditions at the facility. This discussion shall include, but not be limited to, the following information:

a. A description of the regional and facility specific geologic and hydrogeologic characteristics affecting ground-water flow beneath the facility, including:

   i) Regional and facility specific stratigraphy: description of strata including strike and dip, identification of stratigraphic contacts;
   ii) Structural geology: description of local and regional structural features (e.g., folding, faulting, tilting, jointing, metamorphic foliation, etc.);
   iii) Depositional history;
   iv) Regional and facility specific ground-water flow patterns (porous media, fracture media, karst media); and
   v) Identification and characterization of areas and amounts of recharge and discharge (springs in karst terrane, base level streams and rivers).

b. An analysis of any topographic features that might influence the ground-water flow system (e.g., sinkholes and sinking streams in karst terranes).

c. Based on any existing field data, tests (e.g., pump tests, tracer tests), and cores, a representative and accurate classification and description of the hydrogeologic units which may be part of the migration pathways at the facility (I. e., the aquifers and any intervening saturated and unsaturated units), including:

   i) Hydraulic conductivity and porosity (total and effective), groundwater flow velocity, groundwater basin discharge;
   ii) Lithology, grain size, sorting, degree of cementation;
   iii) An interpretation of hydraulic interconnections between saturated zones (i.e., aquifers) and surface waters; and
   iv) The attenuation capacity and mechanisms of the natural earth materials (e.g., ion exchange capacity, organic carbon content, mineral content, etc.).

d. Based on data obtained from groundwater monitoring wells and piezometers installed upgradient, water wells and/or springs downgradient of the potential

contaminant source, a representative description of water level or fluid pressure monitoring including:

i) Water-level contour and/or potentiometric maps, including seasonal variations;
ii) Hydrologic cross sections showing vertical gradients;
iii) The flow system, including the vertical and horizontal components of flow; and
iv) Any temporal changes in hydraulic gradients, for example, due to tidal or seasonal influences and for karst terrane, stormflow.

e. A description of man-made influences that may affect the hydrology of the site, identifying:

i) Local water-supply and production wells with an approximate schedule of pumping; and
ii) Man-made hydraulic structures (pipelines, french drains, ditches, roofs, runways, parking lots, etc.).

2. Soils

The Permittee shall provide an explanation of the soil and rock units above the water table in the vicinity of contaminant release(s). This summary may include, but not be limited to, the following types of information as appropriate:

i) Surface soil distribution;
ii) Soil profile, including ASTM classification of soils;
iii) Transects of soil stratigraphy;
iv) Hydraulic conductivity (saturated and unsaturated);
v) Relative permeability;
vi) Bulk density;
vii) Porosity;
viii) Soil sorption capacity;
ix) Cation exchange capacity (CEC);
x) Soil organic content;
xi) Soil pH;
xii) Particle size distribution;
xiii) Depth of water table;
xiv) Moisture content;
xv) Effect of stratification on unsaturated flow;
xvi) Infiltration;
xvii) Evapotranspiration;
xviii) Storage capacity;
xix) Vertical flow rate; and
xx) Mineral content.

3. Surface Water and Sediment

The Permittee shall provide a description of the surface water bodies in the vicinity of the facility. This summary may include, but not be limited to, the following activities and information:

a. Description of the temporal and permanent surface water bodies including:

i) For lakes and estuaries: location, elevation, surface area, inflow, outflow, depth, temperature stratification, and volume;
ii) For impoundments: location, elevation, surface area, depth, volume, freeboard, and construction and purpose;
iii) For streams, ditches, and channels: location, elevation, flow, velocity, depth, width, seasonal fluctuations, flooding tendencies (i.e., 100 year event), discharge point(s), and general contents.
iv) Drainage patterns; and
v) Evapotranspiration.

b. Description of the chemistry of the natural surface water and sediments. This includes determining the pH, total dissolved solids, total suspended solids, biological oxygen demand, alkalinity, conductivity, dissolved oxygen profiles, nutrients, chemical oxygen demand, total organic carbon, specific contaminant concentrations, etc.

c. Description of sediment characteristics including:

i) Deposition area;
ii) Thickness profile; and
iii) Physical and chemical parameters (e.g., grain size, density, organic carbon content, ion exchange capacity, pH, etc.)

4. Air

The Permittee shall provide information characterizing the climate in the vicinity of the facility. Such information may include, but not be limited to:

a. A description of the following parameters:

i) Annual and monthly rainfall averages;
ii) Monthly temperature averages and extremes;
iii) Wind speed and direction;
iv) Relative humidity dew point;
v) Atmospheric pressure;
vi) Evaporation data;
vii) Development of inversions; and
viii) Climate extremes that have been known to occur in the vicinity of the facility, including frequency of occurrence (i.e., Hurricanes)

b. A description of topographic and man-made features which affect air flow and emission patterns, including:

i) Ridges, hills or mountain areas;
ii) Canyons or valleys;
iii) Surface water bodies (e.g., rivers, lakes, bays, etc.); and
iv) Buildings.

C. Source Characterization

For those sources from which releases of hazardous constituents have been detected, the Permittee shall provide analytical data to completely characterize the wastes and the areas where wastes have been placed, to the degree that is possible without undue safety risks, including: type, quantity;

physical form; disposition (containment or nature of deposits); and facility characteristics affecting release (e. g., facility security, and engineering barriers). Data gaps on source characterization shall be identified and provisions made in Section E to obtain the relevant information to fill the data gap. This summary shall include quantification of the following specific characteristics, at each source area:

1. Unit/Disposal Area Characteristics:

   a. Location of unit/disposal area;
   b. Type of unit/disposal area;
   c. Design features;
   d. Operating practices (past and present)
   e. Period of operation;
   f. Age of unit/disposal area;
   g. General physical conditions; and
   h. Method used to close the unit/disposal area.

2. Waste Characteristics:

   a. Type of wastes placed in the unit;

      i) Hazardous classification (e. g., flammable, reactive, corrosive, oxidizing or reducing agent);
      ii) Quantity; and
      iii) Chemical composition.

   b. Physical and chemical characteristics such as:

      i) Physical form (solid, liquid, gas);
      ii) Physical description (e.g., powder, oily sludge);
      iii) Temperature;
      iv) pH;
      v) General chemical class (e.g., acid, base, solvent);
      vi) Molecular weight;
      vii) Density;
      viii) Boiling point;
      ix) Viscosity;
      x) Solubility in water;
      xi) Cohesiveness of the waste; and
      xii) Vapor pressure.

   c. Migration and dispersal characteristics of the waste such as:

      i) Sorption capability;
      ii) Biodegradability, bioconcentration, and biotransformation;
      iii) Photodegradation rates;
      iv) Hydrolysis rates; and
      v) Chemical transformations.

D. Potential Receptors

The Permittee shall provide data describing the human populations and environmental systems that are susceptible to contaminant exposure from the facility. Data gaps pertinent to receptor analysis shall be identified and provisions made in Section E to obtain the relevant information to fill the data gap. The following characteristics shall be identified at a minimum:

1. Current local uses and planned future uses of groundwater:

   a. Type of use (e.g., drinking water source: municipal or residential, agricultural, domestic/non-potable, and industrial);
   b. Location of groundwater users, to include withdrawal and discharge wells and springs, within one mile of the impacted area.

   The above information should also indicate the aquifer or hydrogeologic unit used and/or impacted for each item.

2. Current local uses and planned future uses of surface waters directly impacted by the facility:

   a. Domestic and municipal (e.g., potable and lawn/gardening watering);
   b. Recreational (e.g., swimming, fishing);
   c. Agricultural;
   d. Industrial; and
   e. Environmental (e.g., fish and wildlife propagation).

3. Human use of or access to the facility and adjacent lands, including but not limited to:

   a. Recreation;
   b. Hunting;
   c. Residential;
   d. Commercial; and
   e. Relationship between population locations and prevailing wind direction.

4. A general description of the biota in surface water bodies on, adjacent to, or affected by the facility.

5. A general description of the ecology within the area adjacent to the facility.

6. A general demographic profile of the people who use have access to the facility and adjacent land, including, but not limited to: age; sex; and sensitive subgroups.

7. A description of any known or documented endangered or threatened species near the facility.

E. Sampling and Analysis Plan(s) for Characterization of Releases of Hazardous Waste/Hazardous Constituents

The Permittee shall prepare a plan to document all monitoring procedures necessary to characterize the extent, fate and transport of releases (i.e., identify sample locations, sample procedures and sample analysis to be performed during the investigation to characterize the environmental setting, source, and releases of hazardous constituents, so as to ensure that all information and data are valid and properly documented). The sampling strategy and procedures shall be in accordance with EPA

Region 4 Environmental Compliance Branch's Standard Operating Procedure and Quality Assurance Manual (SOP) (most recent version). Any deviations from this reference must be requested by the applicant and approved by EPA. If a Risk Assessment is expected to be performed once release characterization is complete or nearly complete, Data Quality Objectives (DQO) for a Human Health Risk Assessment requires a Data Quality Objective of Level 3 or greater.

The Sampling and Analysis Plan must specifically discuss the following unless the SOP procedures are specifically referenced.

1. Sampling Strategy

   a. Selecting appropriate sampling locations, depths, etc.;
   b. Obtaining all necessary ancillary data;
   c. Determining conditions under which sampling should be conducted;
   d. Determining which media are to be sampled (e.g., groundwater, air, soil, sediment, subsurface gas);
   e. Determining which parameters are to be measured and where;
   f. Selecting the frequency of sampling and length of sampling period;
   g. Selecting the types of samples (e.g., composite vs. grab) and number of samples to be collected.

2. Sampling Procedures

   a. Documenting field sampling operations and procedures, including;

      i) Documentation of procedures for preparation of reagents or supplies which become an integral part of the sample (e.g., filters, preservatives, and absorbing reagents);
      ii) Procedures and forms for recording the exact location and specific considerations associated with sample acquisition;
      iii) Documentation of specific sample preservation method;
      iv) Calibration of field instruments;
      v) Submission of appropriate blanks (e.g., field, equipment, trip, etc.);
      vi) Potential interferences present at the facility;
      vii) Construction materials and techniques, associated with monitoring wells and piezometers;
      viii) Field equipment listing and sampling containers;
      ix) Sampling order; and
      x) Decontamination procedures.

   b. Selecting appropriate sample containers;

   c. Sampling preservation; and

   d. Chain-of-custody, including:

      i) Standardized field tracking reporting forms to establish sample custody in the field prior to shipment; and
      ii) Pre-prepared sample labels containing all information necessary for effective sample tracking.
      iii) Chain-of-custody seals for sample containers and shipping coolers.

3. Sample Analysis

Sample analysis shall be conducted in accordance with SW-846: "Test Methods for Evaluating Solid Waste - Physical/Chemical Methods" (most recent version) or an alternate approved method. The sample analysis section of the Sampling and Analysis Plan shall specify the following:

a. Chain-of-custody procedures, including:

   i) Identification of a responsible party to act as sampling custodian at the laboratory facility authorized to sign for incoming field samples, obtain documents of shipment, and verify the data entered onto the sample custody records;
   ii) Provision for a laboratory sample custody log consisting of serially numbered standard lab-tracking report sheets; and
   iii) Specification of laboratory sample custody procedures for sample handling, storage, and dispersement for analysis.

b. Sample storage (e.g., maximum holding times for constituents);

c. Sample preparation methods;

d. Analytical Procedures, including:

   i) Scope and application of the procedure;
   ii) Sample matrix;
   iii) Potential interferences;
   iv) Precision and accuracy of the methodology; and
   v) Method Detection Limits; and
   vi) Practical Quantitative Limits

e. Calibration procedures and frequency;

f. Data reduction, validation and reporting;

g. Internal quality control checks, laboratory performance and systems audits and frequency, including:

   i) Method blank(s);
   ii) Laboratory control sample(s);
   iii) Calibration check sample(s);
   iv) Replicate sample(s);
   v) Matrix-spiked sample(s);
   vi) "Blind" quality control sample(s);
   vii) Control charts;
   viii) Surrogate samples;
   ix) Zero and span gases; and
   x) Reagent quality control checks.

h. External quality control checks by EPA, including:

   i) Spikes and blanks at sampling events for which EPA or its technical representative provides oversight; and

ii) The equivalent of a CLP data package for samples split with EPA or for which EPA specifically requests the package.

I. Preventive maintenance procedures and schedules;

j. Corrective action (for laboratory problems); and

k. Turnaround time.

F. Data Management Plan

The Permittee shall develop and initiate a Data Management Plan to document and track investigation data and results. This plan shall identify and set up data documentation materials and procedures, project file requirements, and project-related progress reporting procedures and documents. The plan shall also provide the format to be used to present the raw data and conclusions of the investigation.

1. Data Record

The data record shall include the following:

a. Unique sample or field measurement code;
b. Sampling or field measurement location and sample or measurement type;
c. Sampling or field measurement raw data;
d. Laboratory analysis ID number;
e. Property or component measures; and
f. Result of analysis (e.g. concentration, data qualifiers).

2. Tabular Displays

The following data shall be presented in tabular displays:

a. Unsorted (raw) data;
b. Results for each medium, or for each constituent monitored;
c. Data reduction for statistical analysis, as appropriate;
d. Sorting of data by potential stratification factors (e.g., location, soil layer, topography); and
e. Summary data

3. Graphical Displays

The following data shall be presented in graphical formats (e.g., bar graphs, line graphs, area or plan maps, isopleth plots, cross-sectional plots or transects, three dimensional graphs, etc.):

a. Display sampling location and sampling grid:
b. Indicate boundaries of sampling area, and area where more data are required;
c. Display geographical extent of contamination, both horizontally and vertically;
d. Illustrate changes in concentration in relation to distances from the source, time, depth or other parameters; and
e. Indicate features affecting inter-media transport and show potential receptors.

G. Project Management Plan - Schedule of Implementation

Permittee shall prepare a Project Management Plan which will cover qualifications of personnel categories and the management control structure for the project. The Permittee shall also provide a schedule for completing the planned RFI activities. The schedule shall be as specific as possible (i.e., it should indicate the number of days/weeks/months required for each major work plan task).

II. RFI REPORT REQUIREMENTS - ELEMENTS OF THE RFI REPORT

The RFI Report shall include, at a minimum, the following elements:.

A. Introduction

The Permittee shall describe the purpose of the RFI Work Plan and provide a summary description of the project.

B. Environmental Setting

The Permittee shall describe the Environmental Setting in and around the facility. The RFI Work Plan should contain some, if not all, of the information on the Environmental Setting. Any information collected during work plan implementation which clarifies or improves understanding of the Environmental Setting should be provided in this section.

C. Source Characterization

The Permittee shall summarize the sources of contamination and nature of releases identified at the facility. The RCRA Facility Assessment and the RFI Work Plan should contain some, if not all, of the information on Source Characterization. Any information collected during work plan implementation or obtained from the sources (e.g., voluntarily or from other Environmental Programs) which directly addresses Source Characterization should be provided in this section.

D. Sampling and Anaylsis Results

The Permittee shall present data results obtained pursuant to the RFI Work Plan. The Permittee shall identify any work plan proposals which were not completed and explain why such actions were not finished. The Permittee shall also present its analysis/interpretation of how the sampling data meet the RFI objective and how the sampling data fits or modifies the contaminant conceptual model. For all analytical data, the Permittee shall discuss the results of data quality/data review.

E. Data Quality Assurance/Data Quality Data Review

The Permittee shall perform a Quality Assurance/Quality Control data review on all data present in the RFI. The Quality Assurance/Quality Control data review shall be in accordance with the USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review (EPA-540/R94-013) and the USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review (EPA-540/R94-012). The data review shall address the foilowing, at minimum:

a. Holding times;
b. Blanks;
c. Laboratory Control Samples;
d. Field Duplicates;

e. Surrogate Recoveries;
f. Matrix Spike/Matrix Spike Duplicates
g. Data Assessment - Data Usability.

F. Conclusions

The Permittee shall summarize the major conclusions reached after analysis of the environmental setting, source characterization, sampling and analysis results and data quality. Any data gaps, needed to complete characterization of the scope and extent of the releases from SWMUs and/or AOCs or to refine further the contaminant conceptual model, shall be identified and recommendations made in the Recommendations Section of the report.

G. Recommendations

The Permittee shall provide its recommendations on what, if any, further action is needed to complete the characterization of release(s) from SWMUs and/or AOCs.

H. Work Plan for Additional Investigations

If further investigations are determined to be needed to complete the objective of the RFI, then the Permittee shall provide a work plan to complete characterization of the release(s).

APPENDIX C

Corrective Measures Study (CMS)
Outline

APPENDIX C

CORRECTIVE MEASURE STUDY (CMS) OUTLINE

The purpose of the CMS portion of the RCRA corrective action process is to identify and evaluate potential remedial alternatives for the releases of hazardous constituents that have been identified at the facility through the RFI or other investigations to need further evaluation. The scope and requirements of the CMS are balanced with the expeditious initiation of remedies and rapid restoration of contaminated media. The scope and requirements of the CMS should be focused to fit the complexity of the site-specific situation. It is anticipated that Permittee's with sites with complex environmental problems may need to evaluate a number of technologies and corrective measure alternatives. For other facilities, however, the evaluation of a single corrective measure alternative may be adequate. Therefore, a streamlined or focused approach to the CMS may be initiated. Information gathered during any stabilizations or interim measures will be used to augment the CMS and in cases where corrective action goals are met, may be a substitute for the final CMS.

Regardless of whether a streamlined/focused or a detailed CMS is required, a CMS Work Plan and CMS Report are generally required elements. The requirements for a full, detailed CMS are listed below. The Agency has the flexibility not to require sections of the plan and/or report, where site-specific situations indicate that all requirements are not necessary. Additionally, the Agency may require additional studies besides these discussed in order to support the CMS.

I. Corrective Measures Study (CMS) Work Plan

A. Elements of the CMS Work Plan

The Corrective Measures Study (CMS) Work Plan shall include at a minimum the following elements:

1. A brief site-specific description of the overall purpose of the CMS;

2. A brief description of the corrective measure objectives, including proposed target media cleanup standards (e.g., promulgated federal and state standards) and preliminary points of compliance or a description of how a risk assessment will be performed (e.g., guidance documents);

3. A brief description of the specific corrective measure technologies and/or corrective measure alternatives which will be studied;

4. A brief description of the general approach to investigating and evaluating potential corrective measures;

5. A detailed description of any proposed pilot, laboratory and/or bench scale studies;

6. A proposed outline for the CMS Report including a description of how information will be presented;

7. A brief description of overall project management including overall approach, levels of authority (include organization chart), lines of communication, project schedules, budget and personnel. Include a description of qualifications for personnel directing or performing the work;

8. A project schedule that specifies all significant steps in the process and when key documents (*e.g.*, CMS Progress Reports, draft CMS Report) are to be submitted to the Agency;

9. A detailed Public Involvement Plan.

II. Corrective Measures Study (CMS) Report

The detail of a CMS may vary based upon the complexity of the site, on-going Interim Measures, etc. However, the CMS Report may include the following elements:

A. Introduction/Purpose

The Permittee shall describe the purpose of the CMS Report and provide a summary description of the project.

B. Description of Current Situation

The Permittee shall submit a summary and an update to the information describing the current situation at the facility and the known nature and extent of the contamination as documented by the RCRA Facility Investigation (RFI) Report. This discussion should concentrate on those issues which could significantly affect the evaluation and selection of the corrective measures alternative(s). The Permittee shall provide an update to information presented in the RFI regarding previous response activities and interim measures which have or are being implemented at the facility. The Permittee shall also make a facility-specific statement of the purpose for the response, based on the results of the RFI. The statement of purpose should identify the actual or potential exposure pathways that should be addressed by corrective measures.

C. Establishment of Proposed Media Specific Cleanup Standards

The Permittee shall describe the proposed media cleanup standards and point of compliance. The standards must be either background, promulgated federal and state standards or risk-derived standards. If media clean-up standards are not proposed, then the Agency will unilaterally propose setting media clean-up standards to either background, promulgated federal and state standards or the most conservative risk-derived standards.

D. Identification, Screening and Development of Corrective Measure Technologies

1. Identification: List and briefly describe potentially applicable technologies for each affected media that may be used to achieve the corrective action objectives. Include a table that summarizes the available technologies.

   The Permittee should consider innovative treatment technologies, especially in situations where there are a limited number of applicable corrective measure technologies.

2. Screening: The Permittee shall screen the corrective measure technologies to eliminate those that may prove infeasible to implement, that rely on technologies unlikely to perform satisfactorily or reliably, or that do not achieve the corrective measure objective within a reasonable time period. This screening process focuses on eliminating those technologies which have severe limitations for a given set of waste and site-specific conditions. The screening step may also eliminate technologies based on inherent technology limitations.

   Site, waste, and technology characteristics which are used to screen inapplicable technologies are described in more detail below:

a. Site Characteristics: Site data should be reviewed to identify conditions that may limit or promote the use of certain technologies. Technologies whose use is clearly precluded by site characteristics should be eliminated from further consideration.

b. Waste Characteristics: Identification of waste characteristics that limit the effectiveness or feasibility of technologies is an important part of the screening process. Technologies clearly limited by these waste characteristics should be eliminated from consideration. Waste characteristics particularly affect the feasibility of in-situ methods, direct treatment methods, and land disposal (on/off-site).

c. Technology Limitations: During the screening process, the level of technology development, performance record, and inherent construction, operation, and maintenance problems should be identified for each technology considered. Technologies that are unreliable, perform poorly, or are not fully demonstrated may be eliminated in the screening process. For example, certain treatment methods have been developed to a point where they can be implemented in the field without extensive technology transfer or development.

3. Corrective Measure Development: The Permittee shall assemble the technologies that pass the screening step into specific alternatives that have the potential to meet the corrective action objectives for each media. Options for addressing less complex sites could be relatively straight-forward and may only require evaluation of a single or limited number of alternatives. Each alternative may consist of an individual technology or a combination used in sequence (i.e., treatment train). Different alternatives may be considered for separate areas of the facility, as appropriate. List and briefly describe each corrective measure alternative.

E. Evaluation of a Final Corrective Measure Alternative

For each remedy which warrants a more detailed evaluation (i.e., those that passed through the screening step), including those situations when only one remedy is being proposed, the Permittee shall provide detailed documentation of how the potential remedy will comply with each of the standards listed below. These standards reflect the major technical components of remedies including cleanup of releases, source control and management of wastes that are generated by remedial activities. The specific standards are as follows:

1. Protect human health and the environment.
2. Attain media cleanup standards set by EPA.
3. Control the source of releases so as to reduce or eliminate, to the extent practicable, further releases that may pose a threat to human health and the environment.
4. Comply with applicable standards for management of wastes.
5. Other factors.

In evaluating the selected alternative or alternatives, the Permittee shall prepare and submit information that documents that the specific remedy will meet the standards listed above. The following guidance should be used in completing this evaluation.

1. Protect Human Health and the Environment

Corrective action remedies must be protective of human health and the environment. Remedies may include those measures that are needed to be protective, but are not directly related to media cleanup, source control or management of wastes. An example would be a

requirement to provide alternative drinking water supplies in order to prevent exposures to releases from an aquifer used for drinking water purposes. Therefore, the Permittee shall provide a discussion of any short term remedies necessary to meet this standard, as well as discuss how the corrective measures alternative(s) meet this standard.

2. Attain Media Cleanup Standards

Remedies will be required to attain media cleanup standards. As part of the necessary information for satisfying this requirement, the Permittee shall address whether the potential remedy will achieve the remediation objectives. An estimate of the time frame necessary to achieve the goals shall be included. Contingent remedies may be proposed if there is doubt if the initial remedy will be successful (*e.g.*, contingent remedies to innovative technologies).

3. Control of Sources of Releases

The Permittee shall address the issue of whether source control measures are necessary, and if so, the type of actions that would be appropriate. Any source control measure proposed should include a discussion on how well the method is anticipated to work given the particular situation at the facility and the known track record of the specific technology.

4. Comply With any Applicable Standards for Management of Wastes

The Permittee shall include a discussion of how the specific waste management activities will be conducted in compliance with all applicable state and federal regulations (e.g., closure requirements, LDRs)

5. Other Factors

There are five general factors that will be considered as appropriate by EPA in selecting/approving a remedy that meets the four standards listed above. These five decision factors include:

a. Long-term reliability and effectiveness;
b. Reduction in the toxicity, mobility or volume of wastes;
c. Short-term effectiveness;
d. Implementability; and
e. Cost.

Examples of the type of information to include are provided below:

a. Long-term reliability and effectiveness: The Permittee may consider whether the technology, or combination of technologies, have been used effectively under analogous site conditions, whether failure of any one technology in the alternative would have any immediate impact on receptors, and whether the alternative would have the flexibility to deal with uncontrollable changes at the site. Operation and maintenance requirements include the frequency and complexity of necessary operation and maintenance. In addition, each corrective measure alternative should be evaluated in terms of the projected useful life of the overall alternative and of its component technologies. Useful life is defined as the length of time the level of effectiveness can be maintained.

b. Reduction in the toxicity, mobility or volume of wastes: As a general goal, remedies will be preferred that employ techniques that are capable of eliminating

or substantially reducing the potential for the wastes in SWMUs and/or contaminated media at the facility to cause future environmental releases. Estimates of how the corrective measure alternative will reduce toxicity, mobility and or volume of the waste is required and may be accomplished through a comparison of initial site conditions to expected post-corrective measures conditions.

c. Short-term effectiveness: The Permittee shall evaluate each corrective measure alternative for short-term effectiveness. Possible factors to consider are fire, explosion, exposure to hazardous constituents and potential threats associated with the treatment, excavation, transportation and re-disposal or containment of the waste material.

d. Implementability: Information to consider when assessing implementability include:

i) The administrative activities needed to implement the corrective measure alternative (e.g. permits, rights of way, etc.) and the length of time these activities will take;

ii) The constructibility, time for implementation, and time for beneficial results;

iii) The availability of adequate off-site treatment, storage capacity, disposal services, needed technical services and materials; and

iv) The availability of prospective technologies for each corrective measure alternative.

e. Cost: The Permittee shall develop an estimate of the cost of each corrective measure alternative (and for each phase or segment of the alternative). The cost estimate shall include both capital and operation and maintenance costs. The capital costs shall include, but are not limited to, costs for: engineering, site preparation, construction, materials, labor, sampling/analysis, waste management/disposal, permitting, health and safety measures, etc. The operation and maintenance costs shall include labor, training, sampling and analysis, maintenance materials, utilities, waste disposal and/or treatment, etc. Costs shall be calculated as the net present value of the capital and operation and maintenance costs.

F. Justification and Recommendation of the Corrective Measure or Measures

The Permittee shall justify and recommend in the CMS Report a corrective measure alternative for consideration by the Agency. Such a recommendation should include a description and supporting rationale for the preferred alternative that is consistent with the corrective action standards and remedy selection decision factors discussed above. In addition, this recommendation shall include summary tables which allow the alternative or alternatives to be understood easily. Trade-offs among health risks, environmental effects, and other pertinent factors shall be highlighted. The Regional Administrator will select the corrective measure alternative or alternatives to be implemented based on the results presented in the CMS Report.

APPENDIX D

Schedule of Compliance

Schedule of Compliance	Due Date
Notification of Newly Identified SWMUs and AOCs *Condition II.B.1. and* *Condition II.B.2.*	Within fifteen (15) calendar days of discovery
SWMU Assessment Report *Condition II.B.3.*	Within ninety (90) calendar days of notification
Notification for Newly Discovered Releases at Previously Identified SWMUs and AOCs *Condition II.C.1.*	Within fifteen (15) calendar days of discovery
Confirmatory Sampling Work Plan for SWMUs or AOCs identified in Appendix A.3 *Condition II.D.1*	Within forty-five (45) calendar days after effective date of permit
Confirmatory Sampling Work Plan for SWMUs identified under Condition II.B.4. or AOCs identified under Condition II.B.1. *Condition II.D.2.*	Within forty-five (45) calendar days of notification by the Regional Administrator (RA)
Confirmatory Sampling Report *Condition II.D.5.*	In accordance with the approved CS Work Plan
RFI Work Plan for SWMU(s) and AOC(s) identified under Condition II.A.1. *Condition II.E.1.a.*	Within ninety (90) calendar days from effective date of permit
RFI Work Plan for SWMU(s) and AOC(s) Identified under Condition II.B.4., Condition II.C.2., or Condition II.D.6. *Condition II.E.1.b.*	Within ninety (90) calendar days after receipt of notification by Regional Administrator (RA) which SWMUs or AOCs require an RFI
Draft RFI Report *Condition II.E.3.a.*	In accordance with the approved RFI Work Plan

Schedule of Compliance	Due Date
Final RFI Report *Condition II.E.3.c.*	Within thirty (30) calendar days after receipt of RA's final comments on Draft RFI Report
RFI Progress Reports *Condition II.E.3.d.*	Quarterly, beginning ninety (90) calendar days from the start date specified by the RA *
Interim Measures Work Plan *Condition II.F.1.a.*	Within thirty (30) calendar days of notification by RA
Interim Measures Progress Reports *Condition II.F.3.a.*	In accordance with the approved Interim Measures Work Plan ** or semi-annually for Permittee initiated IM
Interim Measures Report *Condition II.F.3.b.*	Within ninety (90) calendar days of completion
CMS Work Plan *Condition II.G.1.a.*	Within ninety (90) calendar days of notification by RA that a CMS is required
Implementation of CMS Work Plan *Condition II.G.2.*	Within fifteen (15) calendar days after receipt of RA approval of Plan
Draft CMS Report *Condition II.G.3.a.*	In accordance with the schedule in the approved CMS Work Plan
Final CMS Report *Condition II.G.3.a.*	Within thirty (30) calendar days of RA's final comments on Draft CMS Report
Demonstration of Financial Assurance *Condition II.H.3.*	Within one hundred twenty (120) calendar days after permit modification for remedy

Schedule of Compliance	Due Date
Noncompliance/Imminent Hazard Report *Condition I.D.14.*	Oral within 24 hours and written within fifteen (15) calendar days of becoming aware of the hazardous circumstances
Complete installation of emission control technology for units identified under *Condition IV.A.3.*	By "Installation Due Date" under Condition IV.A.3.
Written report of noncompliance of tanks, surface impoundments or containers with 40 CFR §§ 264.1082(c)(1) or (c)(2) *Condition IV.D.1.*	Within fifteen (15) calendar days of becoming aware of noncompliance
Written report of noncompliance of tanks with 40 CFR §§ 264.1084(c)(1) or (c)(2) *Condition IV.D.2.*	Within fifteen (15) calendar days of becoming aware of noncompliance
Semi-Annual Report for Use of Control Devices 40 CFR § 264.1090(c) *Condition IV.D.3.***	Semi-annually, beginning six (6) months from the effective date of the permit

The above reports must be signed and certified in accordance with 40 CFR §270.11.

* This applies to Work Plan execution that requires more than one hundred eighty (180) calendar days

** This applies to Work Plan execution that requires more than one year.

*** Semi-annual report is not required if provisions of Condition IV.D.4. are met

APPENDIX E

Action Levels

APPENDIX E

ACTION LEVELS

I. Definition

Action levels are conservative health-based concentrations of hazardous constituents determined to be indicators for the protection of human health or the environment. Action levels shall be set for all hazardous constituents, a subset of hazardous wastes, identified in the RFI Report(s) or for those hazardous constituents which the Regional Administrator has reason to believe may have been released from a solid waste management unit (SWMU) or Area of Concern (AOC) at the facility. Should the concentration of a hazardous constituent(s) in an aquifer, surface water, soils, or air exceed its action level for any environmental medium, the Regional Administrator may require the Permittee to conduct a Corrective Measure Study (CMS) to meet the requirements of permit Condition II.G., Appendix C, and 40 CFR §264.101. If the Regional Administrator determines that a constituent(s) released from a SWMU or AOC in quantities below its respective action level(s) may pose a threat to human health or the environment, given site-specific exposure conditions, cumulative effects, ecological concerns, etc., then the Regional Administrator has the authority to require a CMS to meet the requirements of permit Condition II.G., Appendix C, and 40 CFR §264.101.

Action levels shall be concentration levels which satisfy the following criteria:

A. 1. Is derived in a manner consistent with EPA guidelines for assessing human and environmental health risks from hazardous constituents; and

2. Is based on scientifically valid studies conducted in accordance with the Toxic Substances Control Act (TSCA) Good Laboratory Practice Standards, or equivalent; and

3. For human health action levels to address carcinogens, represents a concentration associated with an excess upper bound lifetime cancer risk of 1×10^{-6} for carcinogens due to continuous constant lifetime exposure; and

4. For human health action levels to address systemic toxicants, represents a concentration to which the human population (including sensitive subgroups) could be exposed on a daily basis that is likely to be without appreciable risk of deleterious effects during a lifetime.

B. For constituent(s) detected in groundwater, air, surface water, or soils, for which a concentration level that meets the criteria specified in section I.A.1 through I.A.4 of this appendix is not available or possible, the action level for the constituent(s) shall be the background concentration of the constituent(s).

II. Groundwater

A. Action levels for constituents in groundwater shall be concentrations specified as:

1. MCLs; or

2. For constituents for which MCLs have not been promulgated, a concentration which satisfies the criteria specified in section I.A.1 through I.A.4 of this appendix shall be calculated.

B. In deriving human health action levels for constituents for which MCLs have not been promulgated, the recommended equations/assumptions shall be that followed by Region 3 in its Quarterly Risk-Based Concentration Tables. Because the science of risk assessment is in flux and technical criteria/opinion of today (e.g., content of standardized equations, use of default exposure assumptions, etc.) may change, the Regional Administrator reserves that right to revise the above recommended equations/assumptions as needed to meet the criteria listed in section I.A.1 through I.A.4.

III. Surface Water

A. Action levels for constituents in surface water shall be concentrations specified as:

1. Water Quality Standards established pursuant to the Clean Water Act by the State in which the facility is located, where such standards are expressed as numeric values; or

2. Numeric interpretations of State narrative water quality standards where water quality standards expressed as numeric values have not been established by the State; or

3. MCLs for constituents in surface water designated by the State for drinking water supply, where numeric values or numeric interpretations, described in paragraphs 1 and 2, are not available; or

4. For constituents in surface waters designated by the State for drinking water supply for which numeric values, numeric interpretations, or MCLs are not available, a concentration which meets the criteria specified in section I.A.1 through I.A.4 of this appendix shall be calculated assuming exposure through consumption of the water contaminated with the constituent; or

5. For constituents in surface waters designated for use or uses other than drinking water supply and for which numeric values or numeric interpretations have not been established, a concentration established by the EPA Regional Administrator which meets the criteria specified in section I.A.1 through I.A.4 of this appendix shall be calculated.

B. In deriving human health action levels for constituents in surface water, the recommended equations/assumptions shall be that followed by Region 3 in its Quarterly Risk-Based Concentration Tables. Because the science of risk assessment is in flux and technical criteria/opinion of today (e.g., content of standardized equations, use of default exposure assumptions, etc.) may change, the Regional Administrator reserves that right to revise the above recommended equations/assumptions as needed to meet the criteria listed in section I.A.1 through I.A.4.

IV. Air

A. Action levels for constituents in air shall be defined as concentrations which meet the criteria specified in section I.A.1 through I.A.4. The action levels for air shall be measured or estimated at the facility boundary, or another location closer to the unit if necessary to protect human health and the environment.

B. In deriving human health action levels for constituents in air, the RfC should be utilized as the action level, where available. The RfC includes exposure assumptions, and no calculations are necessary to calculate an action level. If a RfC is not available, the recommended methodology/assumptions shall be that followed in the Region 3 Quarterly Risk-Based Concentration Tables. Because the science of

risk assessment is in flux and technical criteria/opinion of today (e.g., content of standardized equations, use of default exposure assumptions, etc.) may change, the Regional Administrator reserves that right to revise the above recommended equations/assumptions as needed to meet the criteria listed in section I.A.1 through I.A.4.

V. Soils

A. Action levels for constituents in soils shall be concentrations which meet the criteria specified in section I.A.1 through I.A.4 of this appendix.

B. The calculation of human health action levels for soil includes several specific exposure routes which must be evaluated individually: 1) ingestion, 2) inhalation and 3) leachability to groundwater. In deriving action levels to address ingestion, inhalation and leaching, the methodology/assumptions found in the most recent Soil Screening Level Guidance should be reviewed for appropriate equations and assumptions. Because the science of risk assessment is in flux and technical criteria/opinion of today (e.g., content of standardized equations, use of default exposure assumptions, etc.) may change, the Regional Administrator reserves that right to revise the above recommended equations/assumptions as needed to meet the criteria listed in section I.A.1 through I.A.4.

VI. Sediment

A. Action levels for constituents in sediment shall be based on whether human health or ecological health is the major concern. If ecological concerns are deemed to predominate, then action levels for constituents in sediment shall be concentrations based on the latest sediment screening values as calculated by Region 4. Because the science of risk assessment is in flux and technical criteria/opinion of today (e.g., content of standardized equations, use of default exposure assumptions, etc.) may change, the Regional Administrator reserves that right to revise the above recommended equations/assumptions as needed to meet the criteria listed in section I.A.1 through I.A.4.

If an ecological sediment screening value for a constituent of concern has not been generated by Region 4 and cannot be generated using the criteria in sections I.A.1 and I.A.2, then the ecological action level for sediment shall be background. If human health is the prevailing concern, then the human health action level for sediment shall address all applicable exposures.

APPENDIX F

Summary of Organic Air Emissions Standards Controls

[*Fill out table with site-specific information obtained from Part B and/or State permit, information provided below is for example only*]

TABLE F-1
SUMMARY OF TANK MANAGEMENT UNITS SUBJECT TO SUBPART CC
(facility name), (city), (state)
EPA I.D. No. (EPA I.D.No.)

HAZARDOUS WASTE MANAGEMENT UNIT	LOCATION OF HAZARDOUS WASTE MANAGEMENT UNIT	EPA HAZARDOUS WASTE CODES MANAGED	BRIEF WASTE DESCRIPTION	AVERAGE VOLATILE ORGANIC CONCENTRATION of the HAZARDOUS WASTE	SUBPART CC STATUS	CONTROL OPTION (See Table A-3)
Existing Blending and procesing Unit - Unit 102	See Drawing No. 100-3-01	All waste codes as described in Note 1.	Organic solvents and fuels that are liquids, pumpable sludges, semi-solids, or solids.	Greater than or equal to 500 ppmw	Subject to Tank Level 2 Controls as per 264.1084(d)(3)	4

Notes:
1. All wastes approved through the procedures provided in the Waste Analysis Plan, Section C of the November 6, 1997, Part B Permit Application, and permit Conditions IV.B., V.B., and VI.B. of the State of Georgia Part B Operating Permit.

TABLE F 2
SUMMARY OF CONTAINER MANAGEMENT UNITS SUBJECT TO SUBPART CC
(facility name), (city), (state)
EPA I.D. No. (EPA I.D. No.)

HAZARDOUS WASTE MANAGEMENT UNIT	LOCATION OF HAZARDOUS WASTE MANAGEMENT UNIT	EPA HAZARDOUS WASTE CODES MANAGED	BRIEF WASTE DESCRIPTION	AVERAGE VOLATILE ORGANIC CONCENTRATION of the HAZARDOUS WASTE	CONTAINER TYPE (See Note 2)	SUBPART CC STATUS	CONTROL OPTION (See Table A-3)
Existing Drum Storage and Process Unit - Unit 101	See Drawing No. 100-3-01	All wastes codes as described in Note 1.	Organic and inorganic liquids, pumpable sludges, semi-solids, or solids.	Greater than or equal to 500 ppmw	Type A	Container Level 1 Controls per 264.1086(c).	12
					Type B	Container Level 1 Controls per 264.1086(c).	15
					Type C	Container Level 2 Controls per 264.1086(d).	19 (SeeNote 3)
Containerized Waste Storage Unit 103, including Loading/ Unloading Areas A & B	See Drawing No. 100-3-01	All wastes codes as described in Note 1.	Organic and inorganic liquids, pumpable sludges, semi-solids, or solids.	Greater than or equal to 500 ppmw	Type A	Container Level 1 Controls per 264.1086(c).	12
					Type B	Container Level 1 Controls per 264.1086(c).	15
					Type C	Container Level 2 Controls per 264.1086(d).	19 (See Note 3)

Notes:
1. All wastes approved through the procedures provided in the Waste Analysis Plan, Section C of the November 6, 1997, Part B Permit Application, and, as listed in Permit Conditions II.B. and III.B. of the State of Georgia Part B Operating Permit
2. Container Type A: All containers subject to Subpart CC which have a design capacity greater than 0.1m^3 and less than or equal to 0.46 m3.
   Container Type B: All containers subject to Subpart CC which have a design capacity greater than 0.46 m^3 that are not in light material service.
   Container Type C: All containers subject to Subpart CC which have a design capacity greater than 0.46 m^3 that are in light material service.
3. If the generator or transporter does not provide the appropriate documentation to demonstrate compliance via Control Option 19, then the Facility will utilize Control Option 18 to demonstrate compliance with 264.1086(d).

TABLE F-3

METHODS OF COMPLIANCE WITH SUBPART CC STANDARDS

Tanks

1. These tanks shall comply with Level 1 controls which require tanks to have a fixed roof with no visible cracks, holes, gaps, or other spaces in accordance with 264.1084(c). The tank shall be visually inspected for defects initially prior to the tank becoming subject to the requirements and at least once every year thereafter. [40 C.F.R. 264.1084(c)].

2. These tanks are fixed-roof tanks equipped with an internal floating roof and shall comply with Tank Level 2 controls in accordance with 264.1084(e). The internal floating roof shall be visually inspected for defects at least once every 12 months after initial fill unless complying with the alternative inspection procedures in 40 C.F.R. 264.1084(e)(3)(iii). [40 C.F.R. 264.1084(d)(1)]

3. These tanks are equipped with an external floating roof and shall comply with Tank Level 2 controls in accordance with 264.1084(f). The external floating roof seal gaps shall be measured in accordance with the procedures contained in 264.1084(f)(3)(I) within 60 days and at least once every 5 years thereafter. The external floating roof shall be visually inspected for defects at least once every 12 months after initial fill. [40 C.F.R. 264.1084(d)(2)]

4. These tanks are vented through a closed-vent system to a control device and shall comply with Tank Level 2 controls in accordance with 264.1084(g). The tank shall be equipped with a fixed roof and closure devices which shall be visually inspected for defects initially and at least once every year. The closed-vent system and control device shall be inspected and monitored in accordance with 264.1087. [40 C.F.R. 264.1084(d)(3)]

5. These tanks are pressure tanks which shall comply with Tank Level 2 controls in accordance with 264.1084(h). [40 C.F.R. 264.1084(d)(4)]

6. These tanks are located inside an enclosure that is vented through a closed-vent system to an enclosed combustion control device and shall comply with Tank Level 2 controls in accordance with 264.1084(I). The closed-vent system and control device shall be inspected and monitored in accordance with 264.1087. [40 C.F.R. 264.1084(d)(5)]

7. These tanks have covers which have been specified as "unsafe to inspect and monitor" and shall comply with the requirements of 264.1084(I)(1). [40 C.F.R. 264.1084(f) & (g)]

Surface Impoundments

8. These surface impoundments shall have a floating membrane cover in accordance with 264.1085(c). The floating membrane cover shall be visually inspected for defects initially and at least once each year. [40 C.F.R. 264.1085(b)(1)]

9. These surface impoundments shall have a cover that is vented through a closed-vent system to a control device in accordance with 264.1085(d). The surface impoundment cover and its closure devices shall be visually inspected for defects initially and at least once each year. The closed-vent system and control device shall be inspected and monitored in accordance with 264.1087. [40 C.F.R. 264.1085(b)(2)]

10. These surface impoundments have covers which have been designated as "unsafe to inspect and monitor" and shall comply with the requirements of 264.1085(g). [40 C.F.R. 264.1085(c) & (d)]

Containers

11. These containers have a design capacity greater than 0.1 m^3 and less than or equal to 0.46 m^3 and meet the applicable U.S. DOT regulations under the Container Level 1 standards. The container shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted a t a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every 12 months. [40 C.F.R. 264.1086(b)(1)(i) & (c)(1)(i)]

12. These containers have a design capacity greater than 0.1 m^3 and less than or equal to 0.46 m^3 and are equipped with a cover and closure devices which form a continuous barrier over container openings. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted a t a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every 12 months. [40 C.F.R. 264.1086(b)(1)(i) & (c)(1)(ii)]

13. These containers have a design capacity greater than 0.1 m^3 and less than or equal to 0.46 m^3 and are open-top containers in which an organic-vapor suppressing barrier is placed on or over the hazardous waste in the container. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted a t a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every 12 months. [40 C.F.R. 264.1086(b)(1)(i) & c(I)(iii)]

14. These containers have a design capacity greater than 0.46 m^3, are not in light material service and meet the applicable U.S. DOT regulations under the Container Level 1 standards. The container shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted a t a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every 12 months. [40 C.F.R. 264.1086(b)(1)(ii) & (c)(1)(i)]

15. These containers have a design capacity greater than 0.46 m^3, are not in light material service and are equipped with a cover and closure devices which form a continuous barrier over container openings. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted a t a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every 12 months. [40 C.F.R. 264.1086(b)(1)(ii) & (c)(1)(ii)]

16. These containers have a design capacity greater than 0.46 m^3, are not in light material service and are open-top containers in which an organic-vapor suppressing barrier is placed on or over the hazardous waste in the container. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted a t a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every 12 months. [40 C.F.R. 264.1086(b)(1)(ii) & c(I)(iii)]

17. These containers have a design capacity greater than 0.46 m^3, are in light material service and meet the applicable U.S. DOT regulations under the Container Level 2 standards. The container shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted a t a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every 12 months. [40 C.F.R. 264.1086(b)(1)(iii) & (d)(1)(i)]

18. These containers have a design capacity greater than 0.46 m^3, are in light material service and operate with no detectable organic emissions as defined in 40 C.F.R. 265.1081. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted a t a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every 12 months. [40 C.F.R. 264.1086(b)(1)(iii) & (d)(1)(ii)]

19. These containers have a design capacity greater than 0.46 m^3, are in light material service and that have been demonstrated within the preceding 12 months to be vapor-tight using 40 C.F.R. Part 60, Appendix A, Method 27. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted a t a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every 12 months. [40 C.F.R. 264.1086(b)(1)(iii) & (d)(1)(iii)]

20. These containers have a design capacity greater than 0.1 m^3 that are used for treatment of a hazardous waste by a waste stabilization process and are vented directly through a closed-vent system to a control device in accordance with 264.1086(e)(2)(ii). The closed-vent system and control devices shall be inspected and monitored as specified in 264.1087. [40 C.F.R. 264.1086(b)(2) & (e)(1)(i)]

21. These containers have a design capacity greater than 0.1 m^3 that are used for treatment of a hazardous waste by a waste stabilization process and are vented inside an enclosure which is exhausted through a closed-vent system to a control device in accordance with 264.1086(e)(2)(I) & (ii). The closed-vent system and control devices shall be inspected and monitored as specified in 264.1087. [40 C.F.R. 264.1086(b)(2) & (e)(1)(ii)]

JUL 13 1998

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MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
James I. Palmer, Jr., Executive Director

JUL 08 1998

May 18, 1998

Via Fax

Mr. Lloyd W. Taylor, General Manager
Textron Automotive Company, Inc.
635 Highway 332
Grenada, Mississippi 38901

Dear Mr. Taylor:

Re: Public Comment Period
RCRA Part B/HSWA Draft Permit
Textron Automotive Company, Inc.
MSD 007 037 278
Grenada County

The draft RCRA Permit which has HSWA requirements incorporated into it went to Public Notice on Friday, May 15, 1998. Mississippi Hazardous Waste Management Regulations require a forty-five (45) day public comment period at which time any interested party will be afforded the opportunity to submit comments on the proposed permit. This comment period will run from May 15, 1998, to June 30, 1998. Textron comments may also be submitted during the public comment period.

Minor modifications can be made to the permit as a result of comments received during the public comment period. However, significant changes may require an additional public notice.

Since Mississippi has not received full HSWA Authority, EPA will issue a separate HSWA Permit at the same time the state RCRA Permit is issued.

If you have any questions or comments, please call me at (601) 961-5653.

Sincerely,

Tim Aultman

Tim Aultman
Environmental Compliance Division

cc: Mr. John Bozick, Rockwell International Corporation
Ms. Lael Butler, EPA-Region 4

FILE COPY

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James L. Palmer, Jr., Executive Director

May 14, 1998

Ms. Maryhardy B. McElwain, Director
Elizabeth Jones Library
P. O. Box 130
Grenada, Mississippi 38902-0130

Dear Ms. McElwain:

Re: Textron Automotive Company, Inc.
Grenada, Mississippi

The referenced facility has applied to the Mississippi Environmental Quality Permit Board for a Post-Closure Permit. Comments will be accepted through June 30, 1998, on the draft permit.

A copy of the draft permit and the fact sheet supporting the permit conditions are enclosed. Please make these documents available to any member of the public requesting them. However, we do ask that those individuals reviewing the documents leave their names and addresses.

Please call me at (601) 961-5653 if you have any questions.

Sincerely,

Tim Aultman

Tim Aultman
Environmental Compliance Division

Enclosure

FACT SHEET

FOR PERMIT UNDER THE RESOURCE CONSERVATION AND RECOVERY ACT AT TEXTRON AUTOMOTIVE COMPANY, INC GRENADA COUNTY, MISSISSIPPI EPA I.D. NUMBER MSD 007 037 278

This fact sheet is prepared pursuant to Mississippi Hazardous Waste Management Regulations (MHWMR) 124.8 and 40 Code of Federal Regulations (CFR) §124.8 for the draft RCRA Permit Number HW-007-037-278 as developed by Mississippi Department of Environmental Quality (MDEQ) and the U.S. Environmental Protection Agency (EPA) for the Textron Automotive Company, Inc.

Description of Facility

The Textron Automotive Company (Textron) facility is located on Route 332 East, approximately 0.75 miles north of Grenada, Mississippi. It is separated from the town of Grenada by the Yalobusha River and adjacent swamps. The site is actually bisected by Route 332. The main plant area is located southeast of Route 332. The plant property includes 48.6 acres bordered by the Illinois Central Gulf Railroad to the north and east, swampy area to the south, an abandoned road bed to the west, and Rivderdale Creek to the northeast. Surrounding land use is mixed residential, agricultural and industrial.

The facility was constructed in 1961 by Lyons, Incorporated who operated until 1966 when North American Rockwell purchased the site. Textron Incorporated from Providence, Rhode Island purchased the facility on July 1, 1985. Throughout its operational history, the facility has manufactured wheel covers for the automotive industry. Initially, wheel covers were the exclusive product produced. However, in recent times, the product line has been expanded to include the production of thermos cups, window channels and air bag brackets. Wheel covers now account for only 30% of the overall facility product line. The current manufacturing operations include parts stamping, rolling, washing, buffing, polishing, electroplating, painting, assembly and finished goods storage.

Textron has one closed hazardous waste management unit (i.e., a "regulated" unit), the Equalization Lagoon/Surface Impoundment. A regulated unit is a contiguous area of land on or in which hazardous wate is placed. Examples include surface impoundments, waste piles, a land treatment area, a landfill cell, an incinerator, or a tank and its associated piping and containment system. In addition to the regulated unit which is administered by the MDEQ post-closure permit, there have been 26 solid waste management units and 3 areas of concern identified through the RCRA Facility Assessment conducted by a contractor on behalf of the EPA. See Module V for detailed information.

Procedures for Permit Issuance

As described in the public notice, persons interested in commenting on this permit should submit written comments to:

Mississippi Environmental Quality Permit Board
P. O . Box 10385
Jackson, MS 39289-0385

U.S. Environmental Protection Agency
Region 4, Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-3104

This permit will be issued in conformance with Parts 124 and 270 of the Mississippi Hazardous Waste Management Regulations. The comment period for this permit begins May 15, 1998, and ends on June 30, 1998. All comments entered into the record will be considered by both the Mississippi Environmental Permit Board and the EPA before final disposition of the draft permit will be made. Public participation in the permit process is encouraged. For additional information, please contact Mr. Tim Aultman at (601) 961-5653 or Ms. Lael Butler of the EPA at (404) 562-8453.

Permit Process

The purpose of the permitting process is to afford MDEQ and interested citizens the opportunity to evaluate the ability of the Permittee to comply with the applicable requirements promulgated under the Resource Conservation and Recovery Act (RCRA) and the 1984 Hazardous and Solid Waste Amendments to RCRA. The permit conditions are set forth in one concise permit document which describes all statutory requirements of RCRA with which this facility must comply during the duration of the permit.

Permit Structure

The permit is divided into five parts: A section on standard conditions applicable to all hazardous waste management permits (Module I); a section on general facility conditions applicable to all hazardous waste management facilities (Module II); a section establishing requirements for post-closure care of a closed surface impoundment (Module III); a section establishing requirements for a groundwater monitoring program (Module IV) ; and a section adressing applicable Solid Waste Management Unit regulations (Module V). The permit also includes attachments incorporating information taken from the application which expand on permit requirements.

Basis for Draft Permit Conditions

The following section is a summary of the basis for the conditions in the permit. This discussion is organized such that the reviewer can cross-reference conditions of the permit to the section.

MODULE I

Module I of the permit sets forth standard administrative conditions applicable to all hazardous waste management permits. Unless otherwise specified, all citations refer to the regulations as codified in Mississippi Hazardous Waste Management Regulations (MHWMR).

Activity	Regulation (MHWMR)	Permit Condition
Effect of Permit	270.4 270.30(g)	I.A.
Permit Actions	270.30(f) 270.41 270.42 270.43	I.B.
Severability	124.16	I.C.
Definitions	Part 124 Part 260 Part 261 Part 264 Part 270 RCRA	I.D.
Duty to Comply	270.30(a)	I.E.1.
Duty to Reapply	270.10(h)	I.E.2.
Permit Expiration	270.50	I.E.3.
Permit Review Period	270.50(d)	I.E.4.
Need to Halt or Reduce Activity	270.30©	I.E.5.
Duty to Mitigate	270.30(d)	I.E.6.

Proper Opration and Maintenance	270.30(e)	I.E.7.
Duty to Provide Information	264.74(a) 270.30(h)	I.E.8.
Inspection and Entry	270.30(I)	I.E.9.
Monitoring and Records	264.74(b)	I.E.10.
Reporting Planned Changes	270.30(1)(1)&(2)	I.E.11.
Anticipated Noncompliance	270.30(1)(2)	I.E.12.
Transfer of Permit	264.12© 270.30(1)(3) 270.40	I.E.13.
Twenty-four Hour Reporting	270.30(1)(6)	I.E.14.
Other Noncompliance	270.30(1)(10)	I.E.15.
Other Information	270.30(1)(11)	I.E.16.
Signatory Requirement	270.11 270.30(k)	I.F.
Information Submissions	Part 264 270.31	I.G.
Confidential Information	270.12	I.H.
Maintenance of Documents	Part 264	I.I.

MODULE II

Module II of the permit sets forth the specific conditions for this facility with which the Permittee must comply.

Activity	Regulation (MHWMR)	Permit Condition
Facility Description	270.14(b)(1)	II.A. Attachment B

Design and Operation	264.31	II.B.
Required Notices	264.12	II.C.
Security	264.14	II.D. Attachment E
Inspections	264.15	II.E. Attachment E
Contingency Plan	Part 264 Subpart D	II.F. Attachment D
Post-Closure Cost Estimates	264.144	II.G.
Financial Assurance	264.145	II.H.
Incapacity of Owners	264.148	II.I
Record keeping and Reporting	Part 264 Subpart E	II.J.
Special Conditions	270.32	II.K.

MODULE III

Module III of the permit sets forth the specific conditions for the post-closure care of a closed hazardous waste surface impoundment at this facility and with which the Permittee must comply.

Activity	Regulation (MHWMR)	Permit Condition
Applicability	264.110	III.A.
Post-Closure Care Period	264.117	III.B.
Post-Closure Inspection	264.15	III.C.
Post-Closure Groundwater Monitoring	264.117(a) 264.228(b)(3)	III.D. Module IV Attachment C

Post-Closure Maintenance	264.117(a)(1)(ii) 264.228(b)	III.E. Attachment E
Post-Closure Property Use	264.117(c)	III.F.
Removal of Waste	Parts 124 270 264.117(c)	III.G.
Completion of Post-Closure Care Period	264.145(i)	III.H.
Retention of Plan	264.118(b)(3) 264.118(c)	III.I.
Post-Closure Permit Modifications	Parts 124 270	III.J.

MODULE IV

Module IV of the permit establishes specific requirements by which the Permittee must conduct groundwater monitoring in the vicinity of the closed surface impoundment. Conditions in this module are written to ensure compliance with MHWMR Part 264, Subpart F.

Activity	Regulation (MHWMR)	Permit Condition
Applicability	264.90	IV.A.
Monitoring Program Groundwater Monitoring System	264.91 264.97(a) 264.97(c)	IV.B. IV.C. Attachment C
Point of Compliance	264.95	IV.D.
Groundwater Monitoring Requirements	Part 264 264.97	IV.E.
Detection Monitoring	Part 264 264.98	IV.F.
Groundwater Protection Standard	264.92	IV.G.

Parameters/Constituents	264.93	IV.H.
Detection Monitoring Statistcal Procedure	264.97(h)	IV.I.
Sampling and Analysis Procedures	264.97(d)	IV.J. Attachment C
Groundwater Surface Elevation	264.97(f)	IV.K.
Statistical Procedures	264.97(h)	IV.L.
Recordkeeping and Reporting	264.97(j)	IV.M.

MODULE V

Module V of the Permit establishes the requirements for identifying and conducting corrective action on solid waste management units. See section on DRAFT HSWA PERMIT following the list of Attachments for additional information.

Activity	Regulation (MHWMR)	Permit Condition
Applicability	264.101	V.A.
Notification and Assessment of Newly Identified SWMU's and AOC's	270.14(d)	V.B.
Notification Requirements For Newly Discovered Releases	270.14(d)	V.C.
Confirmatory Sampling	270.14(d)	V.D.
RCRA Facility Investigation	264.101	V.E. Attachment H
Interim Measures	264.101	V.F.
Corrective Measures Study	264.101 264.552	V.G. Attachment I

Remedy Approval and Permit Modification	264.552 270.41 270.42	V.H.
Modification of Schedule of Compliance	264.101(b) 270.41(a)(4)	V.I. Attachment J
Work Plan and Report Requirements	270.11 270.30(k)	V.J.
Approval/Disapproval of Submittals	264.101	V.K.
Dispute Resolution	264.101	V.L.

ATTACHMENT A

Attachment A to the permit consists of three figures to clarify unit descriptions and/or permit conditions.

ATTACHMENT B

Attachment B to the permit describes the facility and the regulated units.

ATTACHMENT C

Attachment C to the permit duplicates the Quality Assurance Project Plan submitted with the application. This attachment has two appendices and two figures: Appendix A (boring logs), Appendix B (groundwater depth and flow data), Figure 1 (Site Layout), and Figure 2 (Monitoring Well Diagram).

ATTACHMENT D

Attachment D to the permit duplicates the Contingency Plan submitted with the application.

ATTACHMENT E

Attachment E is a copy of the Post-Closure Plan submitted with the application. A copy of the inspection checklist is attached.

ATTACHMENT F

Attachment F to the permit consists of the Post-Closure Cost Estimates and Financial Assurance Documentation.

ATTACHMENT G

Attachment G to the permit is a Solid Waste Management Unit Summary. Table G.1. lists the solid waste management units (SWMU's) and the areas of concern (AOC's) which require a RCRA Facility Investigation (RFI). Table G.2. lists the SWMU's and AOC's which require no further action. Table G. 3. lists the SWMU's and AOC's which require confirmatory sampling.

ATTACHMENT H

Attachment H to the permit is a RCRA Facility Investigation (RFI) Outline.

ATTACHMENT I

Attachment I is a Corrective Measures Study (CMS) Outline.

ATTACHMENT J

Attachment J to the permit outlines a Schedule of Compliance.

ATTACHMENT K

Attachment K of the permit details the criteria for establishing Action Levels for the following media: groundwater, air, surface water, and soil.

DRAFT HSWA PERMIT

Specific areas of the facility which are subject to the corrective action requirements of HSWA are solid waste management units (SWMUs) and areas of concern (AOCs). SWMUs are any units which have been used for the treatment, storage or disposal of solid waste at any time, irrespective of whether the unit is or ever was intended for the management of solid waste. AOCs are any areas having a probable release of a hazardous waste or hazardous constituent which is not from a SWMU and is determined to pose an current or potential threat to human health or the environment. Based on information submitted by the Permittee, information contained in state and EPA records, and the RCRA Facility Assessment (RFA) report, prepared by an EPA contractor, and finalized October 28, 1998 , twenty-six (26) SWMUs and three (3) AOCs have been identified at this time. Justifications for actions required by the draft HSWA Permit are contained in documentation included in EPA administrative files.

Joint issuance of the HSWA portion of the complete RCRA Permit will provide EPA with the

authority to require necessary corrective action at identified SWMUs or AOCs. Specifically, the HSWA Permit for the Textron facility requires Confirmatory Sampling (CS) for 2 SWMUs and 1 AOC to determine the presence or absence of a release. A release is defined as a hazardous constituent concentration above background.

The HSWA Permit also requires a RCRA Facility Investigation (RFI) for 6 SWMUs and 2 AOCs to characterize the nature and extent of releases to soil, groundwater, surface water, and air. Information gained by the RFI characterization is utilized to determine whether or not a RCRA Corrective Measures Study (CMS) is necessary. If comparison of the characterized release data to conservative health-based levels (i.e., action levels) identifies the potential need for remedial measures, the owner or operator is then responsible for performing a CMS. During this phase of the Corrective Action Process, the owner or operator will identify, study and recommend specific alternatives for remedial action. The CMS includes a public participation plan, and the public will be given an opportunity to comment on the proposed remedial alternative prior to the selection of the final remedy.

Information gathered during the RFI will be used not only to determine the potential need for and support for corrective measures, but also to aid in determining if Interim Measures (IM) are necessary. Interim Measures are activities which prevent or lessen the continued migration of contamination. Interim Measures may be used to protect human health and the environment from current or potential threats. Because Interim Measures often address the most intense and persistent areas of contamination at a facility, Interim Measures are usually incorporated into the proposed final remedy.

Based on current information, corrective action is not warranted for the remaining 18 SWMUs already covered by CS or RFI requirements. Therefore, a no further action decision at this time has been made for these particular SWMUs.

In addition to requiring corrective action at this time for identified SWMUs and AOCs, the permit also includes provisions for notifying EPA of newly identified releases from previously identified SWMUs or AOCs, newly identified SWMUs and newly identified AOCs which are discovered after permit issuance. The Draft HSWA portion of the RCRA Permit also requires notification of imminent hazards, and when applicable, compliance with the requirements developed under land disposal restrictions and organic air emission standards.

VARIANCES

The regulations cited above do not provide for variances.

PROCEDURES

The State of Mississippi's permit will cover those portions of RCRA for which it has final authorization to administer, and the Federal permit addresses the Hazardous and Solid Waste Amendments of 1984. Together, these permits constitute the RCRA permit for this facility.

Since the State permit is written to include those conditions contained in the Federal permit, the State may assume administration of the permit upon receiving authorization for the appropriate sections of the Amendments.

The regulations under 40 CFR and MHWMR 124.10 require that a 45-day comment period be instituted for each draft permit under the Resource Conservation and Recovery Act. The comment period will begin on May 15 , 1998, which is the date of publication of the public notice in major local newspapers of general circulation, and will end on June 30, 1998. The public notice will also be broadcast over a local radio station.

Persons wishing to require a public hearing or to comment on the permit application or the proposed permit conditions should submit such requests or comments in writing to the Permit Board at the address above.

When MDEQ makes a final permit decision to either issue, deny or modify the permit, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final decision. The final permit decision shall become effective thirty (30) days after the service of notice of the decision unless a later date is specified or review is requested under MHWMR 124.19. If no comments requested a substantial change in the draft permit, the final permit shall become effective immediately upon issuance.

OCT 09 1998

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

October 1, 1998

Mr. Don Williams, Environmental Coordinator
Textron Automotive Company
635 Highway 332
Grenada, Mississippi 38901

Re: Compliance Evaluation Inspection
Textron Automotive Company
Grenada, Mississippi
MSD 007 037 278

Dear Mr. Williams:

Enclosed please find an inspection report and checklist that were completed as a result of a Compliance Evaluation Inspection conducted at Textron Automotive Company on September 17, 1998. This inspection revealed no apparent violations of the applicable Mississippi Hazardous Waste Management Regulations. However, this Office insists that the items listed in the Conclusion section of the enclosed inspection report be addressed.

The old Rockwell, International corrective action well, located northeast of the less than 180 day storage area, needs to be repaired so that the potential for surface run-on and accidental contamination is eliminated. This open well should be a concern to Textron as well as Rockwell.

A follow-up inspection will be conducted in the near future to determine if appropriate actions have been taken as requested. Should you have any questions or comments, you can contact me directly at (601) 961-5653.

Sincerely,

Tim Aultman

Tim Aultman
Energy, Construction, and Manufacturing Branch
Compliance and Enforcement Division

Enclosure

cc: D. Whittington, NRO (w/encl.)
Narindar Kumar, USEPA-Region 4 (w/encl.)

THIS COPY FOR

textron_auto_cov.wpd

COMPLIANCE EVALUATION INSPECTION
TEXTRON AUTOMOTIVE COMPANY
GRENADA, MISSISSIPPI

1. **Inspector and Author of Report**

Tim Aultman, Environmental EIT
Mississippi Department of Environmental Quality
Office of Pollution Control
Jackson, Mississippi 39289

2. **Facility Information**

Textron Automotive Company
(a.k.a. Randall-Textron)
Highway 332 East
Grenada, Mississippi 38901
MSD 007 037 278

3. **Responsible Company Official**

Wayne Taylor, General Manager

4. **Inspection Participants**

Tim Aultman, MDEQ
Scott Mills, MDEQ
Wayne Taylor, Textron Automotive Company
Don Williams, Textron Automotive Company

5. **Date and Time of Inspection**

September 17, 1998 @ 9:45 a.m.

6. **Applicable Regulations**

Mississippi Hazardous Waste Management Regulations (MHWMR)
Parts 262, 264, and 268.

7. **Purpose of Inspection**

To perform a Compliance Evaluation Inspection (CEI) to determine Textron Automotive's compliance status with the applicable regulations and the RCRA Post-Closure Permit.

8. **Facility Description**

Textron Automotive Company, formerly known as Randall-Textron, is located off Highway 332 on the north side of Grenada, Mississippi, in the industrial park. Textron Automotive Company was originally built in 1960 by Lyons, Incorporated and sold to North American Rockwell in 1966. In 1985, Textron Automotive Company purchased the facility. The facility is bounded to the north and east by lines of the Central Gulf Railroad, to the west by Highway 332, and to the south by undeveloped wetlands/rural areas. Riverdale Creek runs along the northwest edge of the facility's property line and empties into the Yalobusha River approximately one mile downstream.

Textron Automotive Company manufactures several products including wheel covers, thermos cups, and window glides. The activities associated with these products include processes such as stamping, rolling, washing, polishing, electroplating, and painting.

Currently, the hazardous waste being generated comes from two main areas. The painting operation, through cleaning procedures, generates waste toluene (D001/F005) and the electroplating operation generates rinsate waters and tank bottoms that meet the D007 listing.

9. **Findings**

We began our inspection with a review of the facility records. The records inspected included the waste manifests, inspection logs, contingency plan, training records, and a copy of the RCRA Post-Closure Permit. All records inspected were found in order and up to date with the exception of the contingency plan (SPCC) and the inspection log for the closed surface impoundment. The SPCC plan was last revised in April of 1996, and did not reflect the current plant manager. (The inspection log for the closed surface impoundment was reviewed after our tour of the facility and will be discussed later in the report.)

After reviewing the records, Mr. Williams accompanied us on a tour of the facility, including the satellite accumulation area, the less-than-one hundred eighty day storage area, the closed surface impoundment, and the on-site wastewater treatment facility.

The satellite accumulation area is located in the back of the facility, inside a small paint mix room, near the paint operation. The area contained one drum of waste toluene (D001/F005), one drum of waste paint filters (D007), and one drum of waste paint rags (F005). Each drum was labeled and closed. However, the drums of waste appeared to be the same drums as noted in the July 1997 inspection report. In the July report, the drums were noted as 90, 25, and 5 percent full, respectively and dated with an accumulation start date of 12/31/96. During the current inspection, the drum of waste toluene appeared to be full and all three drums were still dated with an accumulation start date of 12/31/96. According to Mr. Williams, the date was placed on the drums to indicate the date the drum was placed in the satellite area to begin accumulation of waste. I requested that he initiate the proper steps for disposal of the waste toluene and remove the accumulation start dates from the remaining

satellite drums until they are considered full and ready to be moved to the less than 180 day storage area.

The less-than-one hundred eighty day storage area (for SQG's only) exceeds the requirements set forth by the applicable regulations. The area is bermed, roofed, fenced and locked, and warning signs are clearly visible. At the time of this inspection, three drums of flourescent light bulbs were stored in the area. The drums were in good condition, closed, and properly labeled as Flourescent Light Bulbs (D009). However, only two of the three drums were properly dated with an accumulation start date (4-14-98). Therefore, it was unclear whether or not the third drum had exceeded the 180 day limit. According to Mr. Williams, the three drums were placed in the less than 180 day storage area on the same day. I requested that he date the drum and insure that the 180 day limit for the three drums is not exceeded unless he can justify that the disposal facility is greater than 200 miles away and that he is holding onto the drums for sufficient quantity prior to shipment.

Next, a visual inspection of the closed surface impoundment and associated ground water monitoring wells was conducted. The final cap of the unit was in good condition with no apparent evidence of erosion or subsidence and appeared to have been recently mowed. However, the North side of the cap had a large area of kudzu growing on it. The kudzu was approximately two feet high and would therefore inhibit a thorough inspection of the final cap. Warning signs were visible from all angles of approach. The ground water monitoring wells appeared to be in good condition. However, they were still not labeled (i.e. MW#1) and the locks on each well cap were still rusted shut.

After finishing our tour of the on-site wastewater treatment facility, we went back inside to review the inspection log for the closed surface impoundment. The inspection log indicated that there were no problems for any of the items listed on the checklist. However, as described above, we noted the lack of identification on the wells, inoperable locks, and kudzu growing on the North side of the final cap. According to Mr. Williams, a boiler operator is in charge of performing the weekly inspections.

A map of the facility layout which shows the location of the satellite accumulation area, the less-than-one hundred eighty day storage area, the closed surface impoundment, and the location of the groundwater monitoring wells is included in Appendix I.

10. **Conclusion**

No apparent violations of the applicable regulations were found on the day of inspection. However, this Office insists that the following items be addressed to reduce the potential for future violations:

a. The facility was informed of the following in the July 1997, inspection report: **According to 40 CFR 262.34.a.(2), the date upon which each period of accumulation begins should be clearly marked and visible for inspection on each container. This is interpreted to mean once the container is placed in the less-**

than-one hundred eighty day storage area. A 55-gallon drum can be kept in a satellite area until it is filled, then the facility has three (3) days to move the drum to the storage area and date the drum. Confusion could arise if an inspection is conducted and the containers located in the satellite area are dated and the date exceeds the three day limit.

The drum of waste toluene in the satellite accumulation area should be shipped off for disposal immediately. The remaining two satellite drums should have the accumulation dates removed until such time as they become full and are ready to be moved into the less than 180 day storage area.

b. The facility was also informed of the following in the July 1997, inspection report: **For easier identification in the field, each of the ground water monitoring wells surrounding the closed surface impoundment should be labeled (i.e. MW#1, MW#2, etc.). Also, the well caps should be locked with operable locks, not locks that are rusted shut.**

Since the facility has recently been issued a RCRA Post-Closure Permit with ground water monitoring requirements, the labeling of the wells and operable locks will be essential. Therefore, Textron should label the wells and install new locks immediately.

c. The contingency plan (SPCC) should be updated as soon as possible to reflect the current plant manager. While correcting this discrepancy, please take the necessary time to thoroughly review the SPCC plan for other changes that may have occurred since the last revision in April 1996.

d. The kudzu growing on the North side of the closed surface impoundment final cap should be removed or mowed routinely as part of the cover maintenance.

e. Textron should take the necessary steps to insure that the required inspections of closed surface impoundment are being conducted properly, and that any problems identified during these inspections are documented in the log.

11. **Signed**

Tim Aultman, EEIT
Energy, Construction, and Manufacturing Branch
Compliance and Enforcement Division

9-28-98
Date

12. **Approved**

Andrew Covington, Chief
Energy, Construction, and Manufacturing Branch
Compliance and Enforcement Division

9/28/98
Date

COMPLIANCE
EVALUATION
INSPECTION

TEXTRON AUTOMOTIVE COMPANY
GRENADA, MISSISSIPPI
MSD 007 037 278

Table of Contents

Part 1
GENERAL SITE INFORMATION

Facility Name: Textron Automotive Company, Inc. (a.k.a. Randall-Textron)

Address: Highway 332 East
Grenada, Mississippi 38901

EPA I.D. Number: MSD 007 037 278

Contact: Mr. Don Williams
Title: Plant Environmental Coordinator

Phone Number: (601) 226-1161

Type of Ownership: Private

Facility Status: GENERATOR & STORAGE

Regulatory Status: PERMITTED (effective August 1, 1998)

Principal Inspector: Tim Aultman
Title: Environmental EIT
Organization: Mississippi Department of Environmental Quality
Phone Number: (601) 961-5653

Inspection Participants:

Name	Title	Representing
Don Williams	Plant Environmental Coordinator	Textron Automotive Co.
Scott Mills	Environmental EIT	MDEQ
Tim Aultman	Environmental EIT	MDEQ

Part 2

GENERAL FACILITY CHECKLIST

Section A - General Facility Standards

1. Does facility have EPA Identification No.? ✓Yes __No __NA
   a. If yes, EPA I.D. No. M S D 0 07 037 278
      If no, explain. _____

2. Has facility received hazardous waste from a foreign source? __Yes ✓No __NA
   a. If yes, has it filed a notice with the Executive Director? __Yes __No ✓NA

Waste Analysis

3. Does facility maintain a copy of the waste analysis plan at the facility? ✓Yes __No __NA
   a. If yes, does it include:
      1. Parameters for which each waste will be analyzed? ✓Yes __No __NA
      2. Test methods used to test for these parameters? ✓Yes __No __NA
      3. Sampling method used to obtain sample? ✓Yes __No __NA
      4. Frequency with which the initial analyses will be reviewed or repeated? ✓Yes __No __NA
4. Does the facility provide adequate security through:
   a. 24-hour surveillance system (e.g., television monitoring or guards)? ✓Yes __No __NA

   OR

   b. 1. Artificial or natural barrier around facility (e.g., fence or fence and cliff)? ✓Yes __No __NA

      Describe _____

      _____

      AND

2. Means to control entry through entrances (e.g., attendant, television monitors, locked entrance, controlled roadway access)? ✓Yes __No __NA

Describe _____

_____

General Inspection Requirements

5. Does the owner/operator maintain a written schedule at the facility for inspecting:
   a. Monitoring equipment? ✓Yes __No __NA
   b. Safety and emergency equipment? ✓Yes __No __NA
   c. Security devices: ✓Yes __No __NA
   d. Operating and structural equipment? ✓Yes __No __NA
   e. Types of problems of equipment:
      1. Malfunction ✓Yes __No __NA
      2. Operator error ✓Yes __No __NA
      3. Discharges ✓Yes __No __NA
6. Does the owner/operator maintain an inspection log? ✓Yes __No __NA
   a. If yes, does it include:
      1. Date and time of inspection? ✓Yes __No __NA
      2. Name of inspector? ✓Yes __No __NA
      3. Notation of observations? ✓Yes __No __NA
      4. Date and nature of repairs or remedial action? ✓Yes __No __NA
      5. Identification of potential problems? ✓Yes __No __NA
   b. Are there any malfunctions or other deficiencies not corrected? (Use narrative explanation sheet.) __Yes ✓No __NA
   c. Are records kept a minimum of three years? ✓Yes __No __NA

Personnel Training

7. Does the owner/operator maintain personnel training records at the facility? ✓Yes __No __NA

Date of most recent training: 10-27-97

How long are they kept? INDEFINITELY

a. If yes, do they include:

1. Job title and written job description of each position? ✓Yes __No __NA
2. Description of type and amount of training? ✓Yes __No __NA
3. Records of training given to facility personnel? ✓Yes __No __NA

Requirements for Ignitable, Reactive, or Incompatible Waste

8. Does facility handle ignitable or reactive wastes? ✓Yes __No __NA
   a. If yes, is waste separated and confined from sources of ignition or reaction (open flames, smoking, cutting and welding, hot surfaces, frictional heat), sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat? ✓Yes __No __NA
      1. If yes, use narrative explanation sheet to describe separation and confinement procedures.
      2. If no, use narrative explanation sheet to describe sources of ignition or reaction.
   b. Are smoking and open flames confined to specifically designated locations? ✓Yes __No __NA
   c. Are "No Smoking" signs posted in hazardous areas? ✓Yes __No __NA
   d. Are precautions documented? ✓Yes __No __NA
9. Check containers
   a. Are containers leaking or corroding? __Yes ✓No __NA
   b. Is there evidence of heat generation from incompatible wastes? __Yes ✓No __NA

Section B - Preparedness and Prevention

1. Is there evidence of fire, explosion, or contamination of the environment? __Yes ✓No __NA
   If yes, use narrative explanation sheet to explain.
2. Is the facility equipped with:
   a. Internal communication or alarm system? ✓Yes __No __NA
      1. Is it easily accessible in case of emergency? ✓Yes __No __NA

b. Telephone or two-way radio to call emergency response personnel? ✓Yes __No __NA

c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? ✓Yes __No __NA

d. Water of adequate volume, hoses, sprinklers, or water spray system? ✓Yes __No __NA

1. Describe source of water TEXTRON WATER TANK

3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? ✓Yes __No __NA

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) ✓Yes __No __NA

5. In the case that more than one police or fire department might respond, is there a designated primary authority? ✓Yes __No __NA

a. If yes, name primary authority GRENADA FIRE DEPT.

6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors, and equipment suppliers? ✓Yes __No __NA

a. Are they readily available to all personnel? ✓Yes __No __NA

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? ✓Yes __No __NA

8. If State or local authorities declined to enter into agreements, is this entered in the operating record? __Yes __No ✓NA

Section C - Contingency Plan and Emergency Procedures

1. Is a contingency plan maintained at the facility? ✓Yes __No __NA

*-PLAN DATED APRIL 1996
-NEEDS TO BE UPDATED.
-PLANT MANAGER NOT THE SAME

a. If yes, is it a revised SPCC Plan? *✓Yes __No __NA

b. Does contingency plan include:

1. Arrangements with local emergency response organizations? ✓Yes __No __NA
2. Emergency coordinator's names, phone numbers and addresses? ✓Yes __No __NA
3. List of all emergency equipment at facility and descriptions of equipment? ✓Yes __No __NA
4. Evacuation plan for facility personnel? ✓Yes __No __NA

2. Is there an emergency coordinator on site or on call at all times? ✓Yes __No __NA

Section D - Manifest System, Recordkeeping, and Reporting

1. Has facility received waste from offsite? __Yes ✓No __NA
   a. If yes, does the owner/operator retain copies of all manifests? __Yes __No ✓NA
      1. Are the manifests signed, dated, and returned to the generator? __Yes __No ✓NA
      2. Is a signed copy given to the transporter? __Yes __No ✓NA
2. Has the facility received any waste from a rail or water (bulk shipment) transporter? __Yes ✓No __NA
   a. If yes, is it accompanied by a shipping paper? __Yes __No ✓NA
      1. Does the owner/operator sign and date the shipping paper and return a copy to the generator? __Yes __No ✓NA
      2. Is a signed copy given to the transporter? __Yes __No ✓NA
3. Has the owner/operator received any shipments of waste that were inconsistent with the manifest (manifest discrepancies)? __Yes ✓No __NA
   a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter? __Yes __No ✓NA
      1. If no, has the Executive Director been notified? __Yes __No ✓NA
4. Does the owner/operator keep a written operating record at the facility? ✓Yes __No __NA
   a. If yes, does it include:
      1. Description and quantity of each hazardous waste received? __Yes __No ✓NA

2. Methods and dates of treatment, storage, and disposal? ✓Yes __No __NA
3. Location and quantity of each hazardous waste at each location? ✓Yes __No __NA
4. Cross-references to manifests/shipping papers? ✓Yes __No __NA
5. Records and results of waste analyses? ✓Yes __No __NA
6. Report of incidents involving implementation of the contingency plan? ✓Yes __No __NA
7. Records and results of required inspections? ✓Yes __No __NA
8. Monitoring, testing, and analytical data, for groundwater required by Subpart F? ✓Yes __No __NA
9. Closure cost estimates and, for disposal facilities, post-closure cost estimates (Part 264)? ✓Yes __No __NA
10 Notices of generators as specified in MHWMR 264.12(b) (Part 264)? ✓Yes __No __NA

b. Does facility have copy of permit on site? EFFECTIVE AUG. 1, 1998 ✓Yes __No __NA

5. Does the facility submit an annual report by March 1 every year? (State regulation) ✓Yes __No __NA

a. If yes, do reports contain the following information:
1. EPA I.D. number? ✓Yes __No __NA
2. Date and year covered by report? ✓Yes __No __NA
3. Description/quantity of hazardous waste? ✓Yes __No __NA
4. Treatment, storage, and disposal methods? ✓Yes __No __NA
5. Monitoring data under MHWMR 265.94(a)(2) and (b)(2) (Part 265)? ✓Yes __No __NA
6. Most recent closure and post-closure cost estimates? ✓Yes __No __NA
7. For TSD generators, description of efforts to reduce volume and/or toxicity of waste generated, and actual comparisons with previous year? ✓Yes __No __NA
8. Certification signed by owner/operator? ✓Yes __No __NA

6. Has the facility received any waste (that does not come under the small generator exclusion) not accompanied by a manifest? __Yes ✓No __NA

a. If yes, has he submitted an unmanifested waste report to the Executive Director? __Yes __No ✓NA

7. Does the facility submit to the Executive Director reports on releases, fires, and explosions; contamination and monitoring data; and facility closure? ✓Yes __No __NA

Part 3
LAND DISPOSAL REQUIREMENTS

Section A - General Information

1. Indicate facility's restricted waste.

SEE WASTE INFO. SHEETS

APPENDIX II

2. Are wastes correctly identified? ✓Yes __No __NA

3. Is generator storing restricted waste on site? ✓Yes __No __NA
   a. If yes, are containers properly labeled? ✓Yes __No __NA

4. If restricted waste has been stored longer than one year, can facility document that such storage was solely for the purpose of accumulation of such quantities as are necessary to facilitate proper recovery, treatment, or disposal? __Yes __No ✓NA

5. Does facility have a case-by-case variance or extension? __Yes ✓No __NA

Section B - Wastes with Treatment Standards

1. Does facility attach LDR certification to manifests of shipments of hazardous waste? ✓Yes __No __NA

2. Does the certification contain the following information:

   a. EPA Hazardous Waste Number? ✓Yes __No __NA
   b. "Underlying Constituents" notification? ✓Yes __No __NA
   c. Treatability group? ✓Yes __No __NA
   d. Manifest Document Numbers? ✓Yes __No __NA
   e. Waste analysis data, where available? ✓Yes __No __NA

f. Date waste is subject to prohibition? ✓Yes __No __NA

g. Certification statement if generator is claiming to meet treatment standards? __Yes __No ✓NA

Section C - Wastes Subject to an Exemption

1. Does facility generate wastes with an exemption to LDRs? __Yes ✓No __NA

a. If so, list:

_____

_____

_____

2. Does facility attach LDR certification to manifests of shipments of hazardous waste? __Yes __No ✓NA

3. Does the certification contain the following information:

a. EPA Hazardous Waste Number? __Yes __No ✓NA
b. "Underlying Constituents" notification? __Yes __No ✓NA
c. Treatability group? __Yes __No ✓NA
d. Manifest Document Numbers? __Yes __No ✓NA
e. Waste analysis data, where available? __Yes __No ✓NA
f. Date waste is subject to prohibition? __Yes __No ✓NA
g. Certification statement if generator is claiming to meet treatment standards? __Yes __No ✓NA

Section D - Recordkeeping

1. Is the following information in the facility's file:

a. Waste analysis procedures? ✓Yes __No __NA
b. Records of waste analysis if used for determination? ✓Yes __No __NA
c. Supporting data for a determination based on "knowledge of waste"? ✓Yes __No __NA

c. One-time notice concerning exclusion? [MHWMR 268.7(a)(8)] __Yes __No ✓NA

d. Notice concerning lab pack exclusion? __Yes __No ✓NA

2. Are all records retained for five years? ✓Yes __No __NA

Part 4
GENERATOR'S CHECKLIST

Section A - Manifest

1. Does generator ship waste offsite? ✓Yes __No __NA
   a. If no, do not fill out Sections B and D.
   b. If yes, identify primary offsite facility(s):

   CHEMICAL WASTE MANAGEMENT / LAIDLAW / RINECO

2. Does generator use manifest? ✓Yes __No __NA
   a. If no, is generator a small quantity generator (generating between 100 and 1000 kg/month)? __Yes __No ✓NA
      1. If yes, does generator indicate this when sending waste to a TSD facility? __Yes __No ✓NA
   b. If yes, does manifest include the following information?
      1. Manifest document No. ✓Yes __No __NA
      2. Generator's name, mailing address, telephone number ✓Yes __No __NA
      3. Generator EPA I.D. No. ✓Yes __No __NA
      4. Transporter Name(s) and EPA I.D. No.(s) ✓Yes __No __NA
      5. a. Facility name, address, and EPA I.D. No. ✓Yes __No __NA
         b. Alternate facility name, address, and EPA I.D. No. ✓Yes __No __NA
         c. Instructions to return to generator if undeliverable ✓Yes __No __NA
      6. Waste information required by DOE - shipping name, quantity (weight or vol.), containers (type and number) ✓Yes __No __NA
      7. Emergency information (optional) (special handling instructions, telephone no.) ✓Yes __No __NA

8. Is the following certification on each manifest form? ✓Yes __No __NA

This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

9. Does generator retain copies of manifests? ✓Yes __No __NA

If yes, complete a through e.

a. 1. Did generator sign and date all manifests? ✓Yes __No __NA

2. Who signed for generator?

Name DON WILLIAMS Title PLANT ENV. COORDINATOR

b. 1. Did generator obtain handwritten signature and date of acceptance from initial transporter? ✓Yes __No __NA

2. Who signed and dated for transporter?

Name VARIES Title —

c. Does generator retain one copy of manifest signed by generator and transporter? ✓Yes __No __NA

d. Do returned copies of manifest include facility owner/operator signature and date of acceptance? ✓Yes __No __NA

e. Does generator retain copies for 3 years? ✓Yes __No __NA

Section B - Hazardous Waste Determination

1. Does generator generate solid waste(s) listed in Subpart D (List of Hazardous Waste)? ✓Yes __No __NA

a. If yes, list waste and quantities (include EPA Hazardous Waste No.)

SEE WASTE INFO. SHEETS - App. II

2. Does generator solid waste(s) listed in Subpart C that exhibit hazardous characteristics? ✓Yes __No __NA

   a. If yes, list wastes and quantities (include EPA Hazardous Waste No.)

   SEE WASTE INFO. SHEETS – App. II

   b. Does generator determine characteristics by:

   X testing, or

   X knowledge of process?

   1. If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)? ✓Yes __No __NA

      a. If equivalent test methods used, attach copy of equivalent methods used.

3. Are there other solid wastes generated by generators? ✓Yes __No __NA

   a. If yes, did generator test all wastes to determine non-hazardous characteristics? ✓Yes __No __NA

      1. If no, list wastes and quantities deemed non-hazardous or processes from which non-hazardous waste was produced (use additional sheet if necessary).

_____

_____

_____

_____

Section C - Pre-transport Requirements

1. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? ✓Yes __No __NA

2. a. Are containers to be shipped leaking or corroding? __Yes ✓No __NA

   b. Use sheet to describe containers and condition.

   c. Is there evidence of heat generation from incompatible wastes in the containers? __Yes ✓No __NA

3. Does generator follow DOT labeling requirements in accordance with 49 CFR 172? ✓Yes __No __NA

4. Does generator mark each package in accordance with 49 CFR 172? ✓Yes __No __NA

5. Is each container of 110 gallons or less marked with the following label? ✓Yes __No __NA

> *HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.*
> *Generator name(s) and address(es)* _____
> *Manifest document No.* _____

6. Does generator have placards to offer to transporters? ✓Yes __No __NA

Section D - Recordkeeping and Records

1. Does generator keep the following reports for 3 years?
   a. Manifests and signed copies from disposal facility? ✓Yes __No __NA
   b. Biennial Reports ✓Yes __No __NA
   c. Exception reports ✓Yes __No __NA
   d. Test results ✓Yes __No __NA
2. Where are the records kept (at facility or elsewhere)?
   ✓facility
   __other If other, describe_____
3. Who is in charge of keeping the records?

   Name Don Williams Title —

Section E - Special Conditions

1. Has generator received from or transported to a foreign Administrator? __Yes ✓No __NA
   a. If yes, has he filed a notice with the Executive Director? __Yes __No ✓NA
   b. Is this waste manifested and signed by a foreign cosignee? __Yes __No ✓NA
   c. If generator transported wastes out of the country, has he received confirmation of delivered shipment? __Yes __No ✓NA

Part 5
CONTAINERS CHECKLIST

Section A - Use and Management

1. Are containers in good condition? ✓Yes __No __NA

Section B - Compatibility of Waste With Container

1. Is container made of a material that will not react with the waste which it stores? ✓Yes __No __NA

Section C - Management of Containers

1. Is container always closed while holding hazardous waste? ✓Yes __No __NA
2. Is container handled so that it will not be opened, handled, or stored in a manner which may rupture it or cause it to leak? ✓Yes __No __NA

Section D - Inspections

1. Does owner/operator inspect containers at least weekly for leaks and deterioration? ✓Yes __No __NA

Section E - Containment

1. Do container storage areas have a containment system? ✓Yes __No __NA
   a. Is the base free of cracks or gaps? ✓Yes __No __NA
   b. Is the base sloped or otherwise designed to drain and remove liquids? ✓Yes __No __NA
   c. Does the containment system have sufficient capacity to contain 10% of the volume of containers or the volume of the largest container? ✓Yes __No __NA
   d. Is any method available to prevent run-on into the containment system? ✓Yes __No __NA
   e. Is spilled or leaked material or accumulated precipitation removed from the containment area in a timely manner? ✓Yes __No __NA

Section F - Ignitable and Reactive Waste

1. Are containers holding ignitable and reactive waste located at least 15 m (50 ft) from facility property lines? ✓Yes __No __NA

Section G - Incompatible Waste

1. Are incompatible wastes or materials placed in the same containers? __Yes __No ✓NA
2. Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste? __Yes __No ✓NA
3. Are incompatible wastes separated from each other by a berm, dike, wall, or other device? __Yes __No ✓NA

Section H - Closure

1. At closure, were all hazardous wastes and associated residues removed from the containment system? __Yes __No ✓NA

Part 6

CLOSED SURFACE IMPOUNDMENT CHECKLIST

Section A - Post-Closure

1. At closure, did owner/operator:

   a. Remove standing liquid? ✓Yes __No __NA
   b. Remove waste and waste residue? __Yes ✓No __NA
   c. Remove liner? __Yes ✓No __NA
   d. Remove underlying and contaminated soil? __Yes ✓No __NA
   e. If not, did owner/operator demonstrate that the above materials were non-hazardous? __Yes ✓No __NA

      1. If no, has owner/operator closed the impoundment and provided post-closure care? ✓Yes __No __NA

2. Has owner/operator:

   a. Removed or decontaminated waste residues, contaminated system components, subsoils, structures, and equipment; and managed them as hazardous wastes? __Yes ✓No __NA
   b. Eliminated free liquids by removing or solidifying remaining wastes or waste residues? ✓Yes __No __NA
   c. Stabilized remaining wastes to a bearing capacity sufficient to support a final cover? ✓Yes __No __NA
   d. Constructed a final cover? ✓Yes __No __NA

3. Did owner/operator leave any residues in place at closure? ✓Yes __No __NA

4. In post-closure, does owner/operator maintain the integrity of the cover and groundwater monitoring system, and prevent run-on and run-off? *✓Yes __No __NA

   If no, describe:_____
   _____

*- KUDZU NOTED GROWING ON COVER AT THE NORTHEAST CORNER OF THE IMPOUNDMENT. - NEEDS MOWING OR ELIMINATION

Part 7
GROUNDWATER MONITORING CHECKLIST

-REQ'D TO BEGIN SAMPLING FALL '98 PER PERMIT.

Section A - Monitoring System

1. Does the facility have a groundwater monitoring system in operation? * ✓Yes __No __NA
   4-WELL SYSTEM

   a. If yes, does the system consist of: (265.91)(264.97)

      1. At least one upgradient/background well? ✓Yes __No __NA
      2. At least three downgradient wells? ✓Yes __No __NA

   b. Are wells identified in the field? (WELLS ARE STILL NOT LABELED) — __Yes ✓No __NA
   c. Are well heads in good condition (i.e. free of cracks)? ✓Yes __No __NA
   d. Are well heads locked? *(LOCKS ARE STILL INOPERABLE) — * ✓Yes __No __NA
   e. Do well heads have bumper guards or other protection? ✓Yes __No __NA

Section B - Sampling and Analysis (Part 264)

1. Does the facility obtain and analyze samples from the groundwater monitoring system? *(REQ'D TO BEGIN SAMPLING FALL '98)* __Yes __No __NA

2. Has facility developed and ~~followed~~ a groundwater sampling and analysis plan? ✓Yes __No __NA

   a. If yes, does this plan include procedures and techniques for:

      1. Sample collection? ✓Yes __No __NA
      2. Sample preservation? ✓Yes __No __NA
      3. Analytical procedures? ✓Yes __No __NA
      4. Chain-of-custody control? ✓Yes __No __NA
      5. Determining the groundwater surface elevation? ✓Yes __No __NA

3. Has facility specified a statistical method to be used in evaluating groundwater monitoring data? __Yes ✓No __NA

4. Is all groundwater monitoring data recorded in the operating record? __Yes __No __NA

*-REQ'D TO BEGIN SAMPLING FALL '98.

- IN PERMIT ISSUED 8-1-98 WILL REQUIRE THIS INFO.

Section C - Detection Monitoring Program (264.98)

1. Has owner/operator established a detection monitoring system to provide reliable indications for detection releases? ✓Yes __No __NA

   a. If yes, are the following components included in the system:

      1. Background values? __Yes __No __NA
      2. Determination of groundwater flow rate and direction annually? __Yes __No __NA
      3. Determination of statistically significant increases over background concentrations at each well? __Yes __No __NA
      4. If there was a statistically significant increase indicated, did the facility notify the Executive Director per 264.98(g)(1)? __Yes __No __NA
      5. Did facility attempt to demonstrate an apparent increase was not caused by a regulated unit per MHWMR 264.98(g)(6)? __Yes __No __NA
      6. Is all information contained in the facility's operating record? __Yes __No __NA

CHECK NEXT CEI

Section D - Compliance Monitoring Program (264.99)

1. Does the facility operate a compliance monitoring program? __Yes __No __NA

   a. If yes, does the facility:

      1. Determine the groundwater flow rate and direction in the uppermost aquifer annually? __Yes __No __NA
      2. Collect at least four samples from each well at least semi-annually? __Yes __No __NA
      3. Determine whether there is statistically significant evidence of increased contamination at each monitoring well? __Yes __No __NA
      4. If an increase was indicated, did facility notify the Executive Director? __Yes __No __NA
      5. Analyze samples for constituents listed in Appendix IX of Part 264 at least annually? __Yes __No __NA
      6. Record all information in the operating record? __Yes __No __NA

Section E - Corrective Action Program (Part 264 only) (264.100)

1. Does facility follow a corrective action program that meets the facility's permit requirements? __Yes __No ✓NA

Part 8
FINANCIAL REQUIREMENTS CHECKLIST

Section A - Closure

1. Is facility required to provide financial assurance for closure? __Yes ✓No __NA

   a. Type of financial assurance: _____
   b. Amount of closure costs _____
      1. Date of most recent adjustment _____
   c. Effective date of mechanism _____
   d. Expiration date of mechanism _____
   e. Is instrument adequate? __Yes __No ✓NA

Section B - Post-Closure

1. Is facility required to provide financial assurance for post-closure care? ✓Yes __No __NA

   a. Type of financial assurance FINANCIAL TEST
   b. Amount of closure costs $1,330,061
      1. Date of most recent adjustment 3-30-98
   c. Effective date of mechanism 3-30-98
   d. Expiration date of mechanism 3-30-99
   e. Is instrument adequate? ✓Yes __No __NA

Section C - Corrective Action

1. Is facility required to provide financial assurance for corrective action? __Yes ✓No __NA

   a. Type of financial assurance _____
   b. Amount of closure costs _____
      1. Date of most recent adjustment _____
   c. Effective date of mechanism _____
   d. Expiration date of mechanism _____
   e. Is instrument adequate? __Yes __No ✓NA

Section D - Liability Requirements

1. Is facility required to provide liability coverage for sudden accidental occurrences? ✓Yes __No __NA

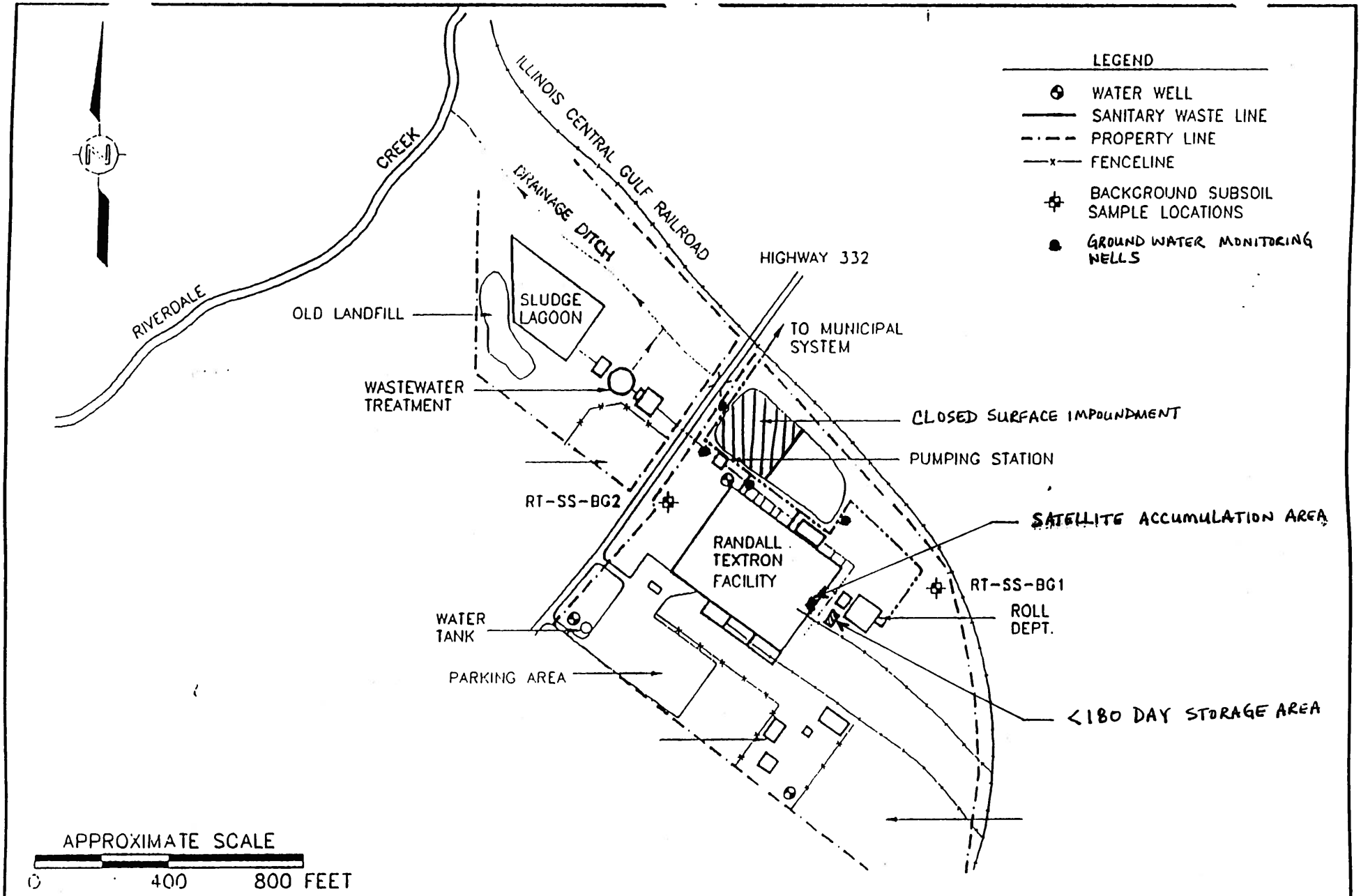
   a. Type of assurance — FINANCIAL TEST
   b. Is amount at least $1 million per occurrence, $2 million annual aggregate? ✓Yes __No __NA
   c. Effective date of mechanism — 3-30-98
   d. Expiration date of mechanism — 3-30-99

2. Is facility required to provide liability coverage for non-sudden accidental occurrences? ✓Yes __No __NA

   a. Type of assurance — FINANCIAL TEST
   b. Is amount at least $3 million per occurrence, $6 million annual aggregate? ✓Yes __No __NA
   c. Effective date of mechanism — 3-30-98
   d. Expiration date of mechanism — 3-30-99

APPENDIX I

FACILITY
MAP



RANDALL TEXTRON FACILITY
GRENADA, MISSISSIPPI

FACILITY MAP

APPENDIX II

WASTE
INFORMATION
WORKSHEETS

Waste Information Worksheet

(To be filled out for each hazardous waste)

Waste Name: CHROME SLUDGE

Waste Code: D007

Process Generating Waste: ELECTROPLATING TANK

How was determination made?

X Testing Describe: _____

X Knowledge of Waste Describe: _____

Waste Generation Rate (may be estimated): _____

Disposal Procedure: _____

Site/Firm: _____

Is waste subject to requirements of MHWMR 268? __Yes __No __NA

Describe: _____

Is waste excluded under MHWMR 261.4? __Yes __No __NA

Describe: _____

Waste Information Worksheet

(To be filled out for each hazardous waste)

Waste Name: WASTE TOLUENE

Waste Code: D001, F005

Process Generating Waste: PAINT CLEANING OPERATIONS

How was determination made?

X Testing Describe: _____

X Knowledge of Waste Describe: _____

Waste Generation Rate (may be estimated): _____

Disposal Procedure: _____

Site/Firm: _____

Is waste subject to requirements of MHWMR 268? __Yes __No __NA

Describe: _____

Is waste excluded under MHWMR 261.4? __Yes __No __NA

Describe: _____

Waste Information Worksheet

(To be filled out for each hazardous waste)

Waste Name: WASTE TRICHLORDETHYLENE

Waste Code: D040, F001

Process Generating Waste: GROUND WATER REMEDIATION

How was determination made?

X Testing Describe: _____

X Knowledge of Waste Describe: _____

Waste Generation Rate (may be estimated): _____

Disposal Procedure: _____

Site/Firm: _____

Is waste subject to requirements of MHWMR 268? __Yes __No __NA

Describe: _____

Is waste excluded under MHWMR 261.4? __Yes __No __NA

Describe: _____

Waste Information Worksheet

(To be filled out for each hazardous waste)

Waste Name: FLUORESCENT LIGHT BULBS

Waste Code: D009

Process Generating Waste: _____

How was determination made?

___Testing Describe: _____

_X_Knowledge of Waste Describe: _____

Waste Generation Rate (may be estimated): _____

Disposal Procedure: _____

Site/Firm: _____

Is waste subject to requirements of MHWMR 268? __Yes __No __NA

Describe: _____

Is waste excluded under MHWMR 261.4? __Yes __No __NA

Describe: _____

Waste Information Worksheet

(To be filled out for each hazardous waste)

Waste Name: WASTE TOLUENE

Waste Code: D001, F005, U220

Process Generating Waste: GROUND WATER REMEDIATION

How was determination made?

X Testing Describe: _____

√ Knowledge of Waste Describe: _____

Waste Generation Rate (may be estimated): _____

Disposal Procedure: _____

Site/Firm: _____

Is waste subject to requirements of MHWMR 268? __Yes __No __NA

Describe: _____

Is waste excluded under MHWMR 261.4? __Yes __No __NA

Describe: _____

Waste Information Worksheet

(To be filled out for each hazardous waste)

Waste Name: WASTE PAINT RELATED MATERIALS

Waste Code: D001, F003, F005

Process Generating Waste: COATING FOR PAINT BOOTHS

How was determination made?

X Testing Describe: _____

___Knowledge of Waste Describe: _____

Waste Generation Rate (may be estimated): _____

Disposal Procedure: _____

Site/Firm: _____

Is waste subject to requirements of MHWMR 268? __Yes __No __NA

Describe: _____

Is waste excluded under MHWMR 261.4? __Yes __No __NA

Describe: _____

Waste Information Worksheet

(To be filled out for each hazardous waste)

Waste Name: PURGE WATER

Waste Code: D043, F002, F003, F005

Process Generating Waste: GROUNDWATER SAMPLING

How was determination made?

X Testing Describe: _____

X Knowledge of Waste Describe: _____

Waste Generation Rate (may be estimated): _____

Disposal Procedure: _____

Site/Firm: _____

Is waste subject to requirements of MHWMR 268? __Yes __No __NA

Describe: _____

Is waste excluded under MHWMR 261.4? __Yes __No __NA

Describe: _____

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
James I. Palmer, Jr., Executive Director

November 13, 1998

Mr. Don Williams, Environmental Coordinator
Textron Automotive Company
635 Highway 332
Grenada, MS 38901

Dear Mr. Williams:

Re: Modification to RCRA Permit
HW-007-037-278
Textron Automotive Company
Grenada County

Receipt is acknowledged of your request for a modification to the referenced RCRA Permit. The indicated modification requires prior approval of the MDEQ per Section C.2 (Appendix I to MHWMR 270.42). This approval is hereby granted; however, before the amended permit attachment can be provided the following information must be submitted:

1. An indication as to which place in Section 13.3 of the Quality Assurance Project Plan the additional passage is to be inserted.

2. Confirmation that the notice required by MHWMR 270.42(a)(1)(ii) has been sent to the facility mailing list. A copy of the addresses is enclosed.

If you have any questions, please call me at 601-961-5117.

Sincerely,

Louis Crawford, P.E.
Environmental Permits Division

enclosure
pc: Mr. Caleb Dana, P.E., Eco-Systems, Inc.
Ms. Lael Butler, U.S. EPA Region 4

d2:textron\mod-001

OFFICE OF POLLUTION CONTROL
P.O. Box 10385 Jackson, MS 39289.0385 Phone 601.961.5171 Fax 601.354.6612

DEC 2 1 1998

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

December 14, 1998

CERTIFIED MAIL NO. Z 039 744 049
Mr. Don Williams, Environmental Coordinator
Textron Automotive Company
635 Highway 332
Grenada, MS 38901

Dear Mr. Williams:

Re: Modification Number 1
Hazardous Waste Permit # HW-007-037-278
Textron Automotive Company
Grenada County

Receipt is acknowledged of your request to modify the referenced permit in regard to the groundwater sampling procedures. My staff has reviewed this request and has determined that it is acceptable and that it would be considered a Class I Modification. Receipt is also acknowledged of the documentation that notification required by MHWMR 270.42(a)(1)(ii) has been made.

Therefore, the following modification has been made to the **SAMPLING AND ANALYSIS PROGRAM** (Section 13.0, Attachment C of the referenced permit) effective immediately:

Procedures for the Low Flow/Low Stress Sampling Technique were added to Section 13.3, **Sample Collection Procedures**.

A complete amended Section 13.0 is enclosed; please insert it into your permit. It is recommended that the old pages be retained in your files. If you have any questions, please contact Mr. Louis Crawford at 601-961-5117.

Sincerely,

Jerry W. Cain, P.E., DEE, Chief
Environmental Permits Division

Enclosure

pc: Ms. Lael Butler, EPA Region 4 (w/ enclosure)
Mr. Caleb H. Dana, Jr., P.E., Eco-Systems, Inc.

THIS COPY FOR

d2:textron\mod-01-2

OFFICE OF POLLUTION CONTROL
P.O. Box 10385 Jackson, MS 39289.0385 Phone 601.961.5171 Fax 601.354.6612

State of Mississippi
Hazardous Waste Management
Permit

THIS CERTIFIES THAT

TEXTRON AUTOMOTIVE COMPANY
GRENADA, MISSISSIPPI

I.D. NO. MSD 007 037 278

is hereby authorized to perform post-closure care of a closed surface impoundment and to conduct corrective action of Solid Waste Management Units.

This permit is issued under the authority of the Mississippi Solid Wastes Disposal Law, and particularly Section 17-17-27 thereof, and rules adopted and promulgated thereunder, all of which authorize the Department of Environmental Quality to enforce all applicable requirements under the Mississippi Hazardous Waste Management Regulations, and associated conditions included therein.

Effective 1st day of August, 1998
Modified 14th day of December, 1998

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

CHIEF, ENVIRONMENTAL PERMITS DIVISION
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

DEC 14 1998
DATE

Expires 31st day of July, 2008

Permit No: HW-007-037-278

13.0 SAMPLING AND ANALYSIS PROGRAM

13.1 SAMPLE CONTAINERS

Samples collected for the Textron Automotive Company Equalization Lagoon Groundwater Monitoring project will use containers selected in accordance with the most recent directives provided by the U.S. EPA. This document specifies container types, cleaning procedures, and quality assurance/quality control requirements related to container use. The certified laboratory will supply pre-cleaned containers and perform QA/QC operations as specified in the EPA container directive.

Sample types and containers are listed below:

ANALYTE	MEDIA	EPA METHOD	No. & CONTAINER TYPE
Volatile Organic Compounds	Groundwater	SW846 Method 8240	3 x B

B Container 40-mL glass vial, 24-mm neck finish

Closure white polypropylene or black phenolic, open-top, screw cap, 15-cm opening, 24-400 size

Septum 24-mm disc of 0.005-in teflon bonded to 0.120-in silicon for total thickness of 0.125-in.

RCRA (8) Metals	Groundwater	6010	1 x C

C Container 1-L high-density polyethylene, cylinder-round bottle, 28-mm neck finish

Closure white polyethylene cap, white ribbed, 28-410 size; F217 polyethylene liner

13.2 HOLDING TIMES AND PRESERVATION METHODS

Water samples collected for VOC analysis using Method 8260 will be preserved by adding 1:1 HCl to obtain a pH less than 2. Water samples will be cooled to 4° C and transported to the testing laboratory at this temperature. Samples must be analyzed within 14 days from the time of sampling.

Water samples collected for RCRA (8) Metals analysis will be preserved using Nitric Acid to obtain a pH less than 2. Samples must be analyzed for Mercury within 28 days from the time of sampling. All other metals must be analyzed within 6 months.

13.3 SAMPLE COLLECTION

Samples of groundwater will be obtained from monitoring wells RT-1, RT02, RT-4 and RT-5 existing at the Textron Automotive Company site. Goundwater samples from monitoring wells will be collected using clean fluorocarbon resin bailers. The bailers will be raised and lowered into the wells using braided cotton rope of an appropriate diameter. Bailers have a single check-valve for sample collection.

Field personnel will verify the appropriate level of personal protection to use for groundwater sampling, in accordance with the approved Site Health and Safety Plan (HASP).

Monitoring wells will be purged using bailers or pumps, depending on recharge rates. At least three well volumes will be removed during the purging process. The amount of water to be removed during purging will be calculated by the following formula:

$(3.1415 \times (r/12)^2) \times (TD - DTW) \times 7.481 =$ 1 well volume (gallons)

Where:

r	=	well radius (inches)
TD	=	well depth (feet)
DTW	=	depth to water (feet)
3.1415	=	π
7.481	=	constant (gal/ft^3)

Depth to water will be determined using an incremented interface probe. The depth to water will be measured from a survey point marked on the well casing. Measurements will be recorded to the nearest 0.01 foot increment.

Field readings of pH, temperature, and specific conductance will be taken from a water sample before, during, and after purging is completed. Concordance of readings will determine if the well has been adequately purged. Purging equipment will be decontaminated using the appropriate procedure before the next well is purged.

VOC samples will be collected in approved sample containers provided by the testing laboratory. The monitoring wells will be purged, and the purge volumes properly handled for containment and disposal. Successive purged water samples should meet the following specifications before sampling:

pH:	± 0.10 s.u.
conductivity:	± 5%
temperature:	± 0.2°F

Disposable nitrile gloves will be worn during the sampling event. During VOC sampling, the bailer will be slowly lowered into the well water, filled, and retrieved. VOC samples will be collected by decanting water from the bailer into 40 mL septum vials. Vials will be filled until a convex meniscus is present, and then capped. The cap will then be secured and vial checked for trapped air. Any samples with entrained air will be discarded, and new samples collected. Duplicate and field blank samples will be prepared concurrently with the sample batch being processed, using identical methods. Samples, blanks and duplicate vials will be assigned unique identification codes that cannot be interpreted by the testing laboratory, but that clearly identify the samples.

Wells will be sampled in the following order:

RT-1 first, RT-5 second, RT-4 third and RT-2 last.

The number and type of blanks and duplicates are described in the project Quality Assurance Program Plan **(Section 1- Table 1.3).** This prevents analytical biases that could arise if blanks and duplicates could be readily identified by the testing laboratory. Trip blanks are prepared by the testing laboratory using distilled or deionized water. The trip blanks accompany the sample vials through the distribution and transportation chain of custody. Field blanks are prepared at the sampling location, prepared using distilled or deionized water instead of sampled groundwater. Field blanks are intended to contact the clean sampling device (bailer) used for collecting groundwater from the monitoring wells.

All samples will be placed on ice (or an ice substitute) in a cooler following collection. Field checklists will be used to verify the proper execution of sampling tasks. These forms will be completed as part of the field notebook documentation. Custody seals will be used for compliance samples.

13.4 SAMPLE CUSTODY PROCEDURE

13.4.1 Sample Identification

A sample numbering system will assign a unique identification number to each sample collected during a sampling event. Quality control and field samples will be included in the identification system. Each sample label and record will include a project identification code, a sample type and location code, and a sampling event code. The field team leader will maintain a log book recording the sample identification listings.

The identification code is designed to prevent the analytical laboratory from identifying QA/QC samples during analysis. This will serve to verify the integrity of the laboratory analysis.

13.4.2 Preliminary Procedures

Checklist verification will be collected before each sampling round to confirm that the analytical laboratory is prepared to receive the samples. The analytical laboratory will be notified two weeks in advance of any scheduled sampling events. Non-routine sampling may be scheduled for other purposes (e.g. monitoring upset conditions). The analytical laboratory will be informed regarding the number of samples, the desired analytical methods to be employed, and the expected sample arrival date.

Sample containers, sample preservative, labels, and custody tape stocks will be reviewed before each sampling event to assure an adequate supply. Trip blanks will be prepared the day before the sampling event.

13.4.3 Sample Custody

Sample collection activities and conditions will be recorded by sampling personnel in field notebooks. Entries will be written in black ink. Mistakes will be lined out with a single stroke, and the corrections initialed and dated by the recorder. Records will be complete enough to reconstruct the sampling activity being recorded. Field notes will be kept in bound books, with sequentially numbered pages. Each log book will carry an individual identification code, and assigned to a specific project team member. Each log book will contain a title page describing:

- Who it is assigned to;
- The log book number;
- The project name;
- The project start date;
- The final log book entry date.

At the beginning of each entry, the date, time, site conditions, team roster, level of protection used, and signature of the person making the entries will be recorded. Sample collection locations will be noted by compass and distance measurements, photographs, or other definitive methods.

Field equipment used will also be recorded, along with calibration data. Sampling equipment, time, location, depths, and volume and number of containers will be recorded for each sampling event, along with the sample identification codes. QA/QC samples will be recorded in the same manner.

Samples will be accompanied by chain of custody forms. Appropriate signatures and container conditions will be recorded on the form when the samples possession is transferred. Records will include sample transfer date, time, and signatures of relinquishing and receiving parties.

Field personnel will verify in the sample log book that samples were properly packed and dispatched to the analytical laboratory with the proper custody documentation. Shipping containers will be secured with package tape and custody seals (when appropriate). The original custody record will be sent with the samples, and copies retained by the field personnel.

If samples are sent by commercial carrier, the carrier is not required to sign the custody forms as long as the sample container custody seals remain intact. If a common carrier is used, a bill of lading should be included in the custody documents. If the sample container is mailed, the container should be sent with return receipt requested.

Evidence files will be maintained by Textron Automotive Company. These files will include log books, records, data packages, pictures, reports, correspondence, subcontractor's reports, and other related project records. This file will be kept by the Project Manager in a secure area, in locked storage cabinets.

13.5 SAMPLE HANDLING AND SHIPPING

Sample containers and preservatives will be selected according to CLP guidance, and the EPA TO-14 method protocol.

13.5.1 Sample Packing and Shipment

The exterior of sampling containers will be decontaminated before packing for shipment to the analytical laboratory. Sample documentation and labeling will conform to methods described in *A Compendium of Superfund Field Operations Methods, U.S. EPA, December, 1987.* Sample packing will follow the general procedure outlined below:

- Sample container is labeled;
- Sample container caps are taped shut;
- Each container is placed in a ziplock bag (or equivalent) that will be sealed prior to shipping;
- Samples shipped in coolers will have the drain plug taped shut and packing material added to cushion the bottom of the cooler;
- Sample containers are placed in the cooler;
- VOC samples are packed in ice or with an ice substitute;
- The remainder of the cooler is filled with packing material to prevent containers from making contact with each other or the cooler walls;
- Custody forms and sampling request forms are placed in a zip lock bag (or equivalent) that will be sealed prior to shipping within the cooler; and
- Appropriate shipping forms are filled out and attached to the cooler; the cooler is sealed with tape; custody seals are placed on the cooler, when appropriate.

13.6 DECONTAMINATION

Samplers will wear nitrile gloves during sampling operations to reduce the prospect for sample cross-contamination. Gloves will be changed between new sampling locations. Other protective clothing will be changed only if there is obvious contamination of surfaces that may affect sample collection.

Decontamination of soil coring devices will be conducted following the use of each device or piece of equipment contacting sampled media. Decontamination will be conducted using a will be conducted using a steam clean cycle or brush scrubbing with Alconox in distilled or deionized water, followed by rinsing with high grade water.

Sample bottles will not be reused, so no additional cleaning after receipt from the analytical laboratory is necessary.

Sampling devices will be clean wrapped in plastic after decontamination. Rinsate blanks will initially be analyzed to confirm the efficiency of the decontamination cycles.

13.7 SAMPLING AND WASTE DISPOSAL

Sampling will produce wastes from:

- Groundwater well purges;
- Disposable sampling equipment;
- Decontamination water;
- Soil core remains post-sampling.

Water wastes will be placed in containers and evaluated for discharge into either the local POTW system or the facility wastewater treatment system. Containers will be marked according to DOT and EPA guidelines. Disposable equipment will be collected in separate containers. Disposal will be accomplished by shipping the disposable material to an appropriate solid waste facility. Laboratory waste will be handled by the analytical laboratory, as described in their waste handling protocols. Soils collected during sampling activities will be placed in 55-gallon drums and characterized for proper disposal. Drums will be stored with locked caps and in an isolated area.